

RDEIR Public Comment to the Proposed Accretive Lilac Hills Ranch [LHR] General Plan Amendment and Specific Plan PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP)

**Valley Center Community Planning Group Comments:**

**1.1 EIR Project Objectives**

The County's Project Objectives from the RDEIR for the proposed Accretive Investments Lilac Hills Ranch Subdivision [the Project] are below:

1. 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.
2. 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.
3. 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.
4. Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.
5. Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.
6. Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.
7. Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.

The County has structured the Objectives to read more like a resort guide than the serious description of a major residential/commercial development. There is no mention of how this Project will fulfill the policies and goals of the General Plan or Community Plans of Valley Center and Bonsall. Mentioning the Community Development Model would be useful if the Project actually adhered to that model rather than perverting its intent. There is no expression of how this Project will successfully integrate with either community. There is no assertion of how this Project has identified a problem in either community, or the county at large, that the Project will uniquely remedy. While it is understandable that the applicant would want very ethereal objectives that attempt to leave no alternative except the Project, the County should be more "objective," more circumspect and more inclined to stick with the General Plan and Community Plans that it so recently adopted.

**Objective 1** – The full text of Objective One is below:

*"Develop a community within northern San Diego County in close proximity to a major*

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C1c-2

C1c-1

The commenter asserts that the project's objectives failed to mention how the project will fulfill the policies and goals of the General and Community Plans, are not "objective" enough and have not identified a problem for which the project can uniquely remedy. The commenter also asserts that the objectives are "ethereal" and do not allow any other alternative except for the project.

The project objectives, developed by the County, are compliant with CEQA Guidelines Section 15124(b). The Guidelines require that a project description contain a statement of objectives *sought by the proposed project* and that the statement of objectives should include *the underlying purpose of the project*. The FEIR Project Description in subchapters 1.1 and 1.2 describes the project's underlying purpose of developing a community with its seven objectives that the community would be consistent with the Community Development Model, provide a range of housing opportunities, provide a variety of recreation opportunities, integrate physical features, preserve natural resources, and accommodate future population growth. The project's objectives are not so specific as to limit the ability of the project to be implemented through a reasonable range of alternatives. A reasonable range of alternatives were discussed in the DEIR that included an alternative which considered a project consistent to the General Plan (see subchapter 4.4.2.). CEQA Guidelines § 15126.6(a) provides that an EIR shall describe a range of reasonable alternatives to the project . . . which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project. . . ." An EIR need not consider every conceivable alternative to a project or alternatives that are infeasible. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564, 276 Cal.Rptr. 410, 801 P.2d 1161.) With respect to the comment that there is no mention of how the project will fulfill the policies and goals of the General Plan please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on related topic.

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	<p>C1c-2 The Regional Categories Map and Land Use Maps are graphic representations of the Land Use Framework and the related goals and policies of the General Plan. (Chapter 3.0, page 18.)</p> <p>The General Plan states that it is intended to be a dynamic document and must be periodically updated to respond to changing community needs. (General Plan, page 1-15) General Plan Policy LU-1.2 permits new villages that are consistent with the Community Development Model and meet the requirements set forth therein. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W for a thorough discussion on related topic.</p> <p>However, because the comment does not raise an environmental issue, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p>
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<p><i>transportation corridor consistent with the County's Community Development Model for a walkable pedestrian-oriented mixed-use community."</i></p> <p><b>Objective 1-a:</b> "Develop a community within northern San Diego County in close proximity to a major transportation corridor..."</p> <p>The County General Plan, approved just three years ago, that does not include the Project, accommodates more growth than SANDAG population forecasts project. There is no requirement, or need, to convert land that is designated by the Community Development Model for agriculture, large animal keeping and estate residential in order to accommodate an additional Village with urban densities in Northern San Diego County.</p> <p>And, while it is in the vicinity of Interstate 15, the proposed Project contemplates overburdening 2.2 E and F two lane, narrow winding country roads to Levels of Service E and F to reach I-15. Further, the Project is requesting <b>ten Exemptions to County Road Standards</b> on the circulation roads that the project will utilize. The Project proposes adding the 22,000 plus Average Daily Trips required by this automobile-based, commuter community to roads it proposes to downgrade in capability.</p> <p>The applicant does not have legal right-of-way to use Mountain Ridge and Covey Lane private roads for the purposes that Accretive proposes for the Project.</p> <p>Accretive does not own legal right of way, nor can they achieve legal right-of-way without the use of Eminent Domain, to build the proposed Covey Lane/West Lilac Road intersection in compliance with minimum County Sight Distance Line standards.</p> <p>For the County to state that this Project is in close proximity of a major transportation corridor without an analysis of the ability of this Project to safely manage its traffic burden and pay for the direct off-site impacts of the Project's congestive Level E and F Level of Service that the Project will directly cause <b>is misleading at best and not in compliance with CEQA and related State and County policies and Regulations.</b></p> <p>As is discussed below, in the new General Plan, unincorporated communities including Valley Center and Bonsall already accommodate more than their fair share of County growth. In keeping with the "Smart Growth" vision and guiding principles that are essential foundations for the entire County General Plan, growth in these communities has purposefully been re-directed to enlarged Village areas where road and sewer infrastructure is in place. Conversely, the new General Plan directs growth away from the more rural countryside.</p> <p><b>The new County General Plan has applied this two-part vision to ensure that Valley Center and Bonsall absorb more than a fair share of San Diego County General Plan growth -- without overdeveloping green field areas.</b></p>	<p>C1c-3</p> <p>The comment states that the project contemplates overburdening 2.2E and F two lane country roads to Levels of Service E and F in order to reach I-15. This statement does not specifically reference which road is being referred to; however, West Lilac Road is the road identified by the project to provide access to I-15. The FEIR does not identify significant and unmitigated impacts to any segments of West Lilac Road. The project will be required to improve West Lilac Road to accommodate anticipated traffic prior to recordation of the Final Map associated with the 929th EDU of the Lilac Hills Ranch Specific Plan. West Lilac Road Improvements between Old Highway 395 and Main Street would be required to meet the General Plan Mobility Element classification of 2.2F or 2.2C, subject to exceptions as approved by the County. Refer to subchapter 2.3 and Appendix E of the FEIR for details on the analysis of impacts and proposed improvements along West Lilac Road. The analysis shows that project impacts to West Lilac Road would be fully mitigated to below a level of significance.</p> <p>The project does include ten requests for exceptions to County Road Standards; however the County does not agree that the project would downgrade the capability of the roads to handle the area traffic. The project includes a change to the Mobility Element classification of West Lilac Road (between Main Street and Road 3) from 2.2C to 2.2F. This change would reduce required right-of-way and shoulder width. The project would include improvements to 2.2F standards subject to an exception request (#5) that would allow construction of a modified half-width 2.2F Light Collector improvement widening the existing 24 feet of pavement to 26 feet.</p> <p>Road Design Alternative 5 analyzes alternative options for improvements to West Lilac Road along the project frontage including (A) follow the existing pavement and build to classification 2.2F unmodified, (B) follow the existing pavement and build to classification 2.2C, and (C) follow the SC-270 alignment and build to classification 2.2C. With any of these options, the road would function adequately with implementation of the project improvements.</p>
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	<p>C1c-4 The comment raises a legal issue, but does not raise an environmental issue within the meaning of CEQA. In any event that portion of the project that will utilize Mountain Ridge Road for access has legal access to both Mountain Ridge Road and Covey Lane. Covey Lane is being improved to private road standards within the project boundary . The project will improve Covey Lane to be dedicated as a public road east of the project boundary up to and not including the intersection at West Lilac Road as allowed by the Grant of Easement held by the project. With respect to the issue regarding line of sight at West Lilac Road and Covey as well as for a thorough discussion on easement rights please refer to the Global Responses: Easements (Covey Lane and Mountain Ridge Road) and Off-site Improvements–Environmental Analysis and Easement Summary Table for a thorough discussion on these topics.</p> <p>C1c-5 The comment asserts that there is no analysis of the project’s impacts and that the project does not mitigate its direct impacts. Subchapter 2.3 of the FEIR provides the analysis the project’s impacts to roads, intersections and Caltrans’ facilities and is based on the Traffic Impact Study, attached as Appendix E to the FEIR. A complete synopsis of the Significant Direct and Cumulative impacts related to the project can be found in subchapter 2.3.S.1. Table 2.3-24 and Table 2.3-25 provide a mitigation summary for the direct and cumulative impacts, respectively, for the project. The analysis and disclosure of impacts and identification of feasible mitigation measures is compliant with CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p> <p>C1c-6 The comment that Valley Center and Bonsall already accommodate more than its fair share of County growth references a forecast of future housing growth in the County shown on Table 1-3 of the General Plan. Table 1-3 represents a forecast of possible future housing growth within the County from 2008 to build-out and identifies the build-out population capacity of the General Plan’s Land Use Map. (General Plan Update FEIR, Chapter 1.0, page 1-27.) In other words, the model identifies the number of future residential units that would be allowed at build-out according to the General Plan’s Land Use Map and existing constraints. (General Plan Update FEIR, Chapter 1.0, page 1-27. )</p>
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	<p>C1c-6 (cont.)</p> <p>The Table mathematically projects theoretical maximum build out but no adjustments are made for actual physical constraints (such as setbacks, slope, terrain, water availability, and other physical limitations) or constraints related to actual market availability of land parcels. Therefore the amount of development presented in this table illustrate how much development is theoretically possible. However, the numbers and actual location of growth are speculative in that it is impossible to anticipate all the circumstances that can affect development nor the reduction of units that may result due to such constraints.</p> <p>Although the commenter notes that Bonsall and Valley Center already has capacity for increases in population as forecasted under the current General Plan, actual development in any city or county is a result of market forces, population growth (including birth rates and immigration) as well as physical constraints as described above, availability of resources and other federal , state and local regulations. The County has only limited control over growth and cannot control external factors such as market demands and the intent of individual property owners, businesses and citizens. While population growth and associated development through the horizon year of the General Plan can be considered reasonably foreseeable, the County's population forecast is regional in scale and potential development on any particular parcel can not be certain at a general plan level. (See General Plan Update FEIR, Chapter 1.0, pp 1-17 and 1-20, which pages are incorporated herein by reference. ) Thus it is reasonably anticipated that as the General Plan is amended over time, housing forecasts can be adjusted appropriately.</p> <p>Although the General Plan has directed growth to certain areas within the community planning areas of Valley Center and Bonsall for development, General Plan Policy LU-1.2 provides a degree of flexibility to the General Plan to accommodate additional population increases as necessary in a manner that meets the requirements of the Sustainable Communities Strategy of the General Plan (consistent with SANDAG's RTP and Assembly Bill 32).</p> <p>Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this related topic.</p>
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## C1c-6 (cont.)

Finally, the statement that road and sewer infrastructure is in place in the North and South Villages of the Valley Center Community Plan (the "Villages") is not accurate. Subchapter 4.1.1.1 of the FEIR analyzed the two sites designated in the Valley Center Community Plan as an alternative project site. These two were found to pose a number of constraints and limitations as compared to the location of the proposed project, including encumbered emergency access and evacuation; greater potential VMT and associated GHG emissions due to the greater distance of these sites from regional facilities (e.g., transportation corridors, employment centers and shopping); and substantially greater constraints and impacts relative to traffic and required roadway improvements. (Subchapter 4.1.1.1 of the FEIR.) Villages were considered and rejected as possible alternative locations for the proposed project. (The Valley Center Community Plan ("VCCP") was adopted by the County on August 3, 2011, and is part of the San Diego County General Plan. The VCCP is incorporated by reference into this response.) Development at the suggested alternative Villages would not avoid or lessen significant environmental effects of the project – in fact the alternative locations would result in some significant environmental effects that the project itself would not generate.

Implementing the proposed project in either Village area would likely result in greater vehicle miles of travel (VMT) and in turn, greater operational GHG emissions than the project. The Villages are located well to the east of the proposed project and about 10 miles by road away from Interstate 15. (See FEIR p. 4-5; see also VCCP Figures 2 and 3.) As discussed in FEIR Appendix E in pages 110-111, the VMT for the project is estimated to be less than that generated for the rest of the Valley Center community (including the Villages areas). In addition, the proposed development is projected to have an average vehicular trip length of 7.6 miles, which is over a half-mile lower than the average trip length for the rest of the Valley Center community. The reduction in VMT and vehicular trip length with the project compared to that related to the Villages will result in fewer operational GHG emissions. (See FEIR Appendix O, pages 65-66.)

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	<p>C1c-6 (cont.)</p> <p>Implementing the proposed project in either of the Village area would also likely result in greater traffic and transportation impacts. Both Villages are located adjacent to Valley Center Road. (See VCCP Figure 3.) Pursuant to the County of San Diego's General Plan Update Final Program EIR, Table 2.15-21, pages 2.15-79 to 2.15-80 (which Table 2.15-21 is incorporated by reference into this response), all of the segments of Valley Center Road near the Villages (from Sunday Drive to Paradise Creek Road) would operate at an LOS E or F (failing) at build-out. The significant impacts caused by the deficient level of service for Valley Center Road (a mobility element road) at build-out could not be avoided even after implementing a range of mitigation measures. And further mitigation measures were deemed to be infeasible due to corresponding significant adverse impacts to important habitats, archeological sites and established communities, as well as the significant costs of potential road improvements. (See County of San Diego General Plan Update Final Program EIR, pages 2.15-42 to 2.15-43, which pages are incorporated by reference into this response.) The proposed project does not cause significant impacts to a mobility element road, such as Valley Center Road, but implementing the project in one of the Village areas (if even possible) would result in such significant impacts. Accordingly, implementing a village development within either of the Village areas would likely result in substantially greater traffic impacts than those associated with the project, since existing roadway infrastructure in the VCCP area around the Villages would not support large increases in traffic intensity and still maintain acceptable levels of service.</p> <p>In addition, implementing the proposed project in either Village area would likely result in significant adverse impacts as to wildland fire hazards compared to those of the project. The VCCP and related Village areas are part of the San Diego County General Plan Update. The County of San Diego's General Plan Update Final Program EIR determined that, even with mitigation measures in place, development under the General Plan Update would not reduce impacts associated with wildland fires to below a significant level. Additional mitigation measures that would fully reduce impacts to below a level of significance were determined to be infeasible. (See</p>
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	<p>C1c-6 (cont.)</p> <p>County of San Diego's General Plan Update Final Program EIR, pages 2.7-57 to 2.7-58, which pages are incorporated by reference into this response.) On the other hand, as explained in subchapter 2.7 of the FEIR, after implementation of mitigation and design features, the project's impacts relating to wildland fires is reduced to less than significant.</p>
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	<p>C1c-7     Although the project's housing units are not included in the estimate of projected Housing Units in Table 1-1, there are numerous policies in the General Plan that contemplate future growth that will occur and provide direction with respect to its future planning. General Plan Policy LU-1.2 prohibits leapfrog development but permits new villages that are consistent with the Community Development Model and meet the requirements set forth therein. The General Plan Framework proposes that growth be directed to targeted areas located in proximity to major infrastructure that would facilitate a reduction of vehicle trips. The project proposes to redirect growth, strategically increasing capacity in certain areas in a manner that is consistent with these General Plan principles and achieves General Plan Framework goals. The project complies with the County General Plan, which requires new villages to be located within existing water and sewer districts and near existing infrastructure and facilities. Additionally, the project site is located less than one-half mile from the I-15 corridor. The proposed project is projected to have an average vehicular trip length of 7.6 miles,</p> <p>(Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W for a thorough discussion on related topic. See also comment C1c-6.)</p>
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The General Plan growth in housing units across the entire County of San Diego is summarized in Table 1-1 below.

Table 1-1 San Diego County General Plan Housing Unit Forecast 2010-2050

CPA	Housing Units				Percent Change			
	2010	2020	2030	2050	2010-2020	2020-2030	2030-2050	2010-50
Alpine	6,535	6,690	7,875	9,157	2.4%	17.7%	16.3%	40.1%
Barona	202	170	170	170	-15.8%	0.0%	0.0%	-15.8%
Bonsall	3,875	4,320	5,149	6,151	11.5%	19.2%	19.5%	50.7%
Central Mountain	2,182	2,305	2,589	2,735	5.6%	12.3%	5.6%	25.3%
County Islands	614	607	607	635	-1.1%	0.0%	4.6%	3.4%
Crest-Dehesa	3,562	3,677	3,926	3,978	3.2%	6.8%	1.3%	11.7%
Desert	3,546	3,453	4,337	6,923	-2.6%	25.6%	59.6%	95.2%
Fallbrook	15,929	16,535	18,559	20,387	3.8%	12.2%	9.8%	28.0%
Jermol-Dulzura	3,234	3,372	4,396	5,263	4.3%	30.4%	19.7%	62.7%
Julian	1,711	1,748	1,884	2,015	2.2%	7.6%	7.0%	17.8%
Lakeside	27,575	28,517	30,339	30,915	3.4%	6.4%	1.9%	12.1%
Mountain Empire	3,023	3,056	3,903	5,108	1.1%	27.7%	30.9%	69.0%
North County								
Metro	16,114	19,548	24,090	25,946	21.3%	23.2%	7.7%	61.0%
North Mountain	1,527	1,759	2,002	2,388	15.2%	13.8%	19.3%	56.4%
Otay	7	490	2,035	2,158	6900.0%	315.3%	5.9%	30700.0%
Pala-Pauma	1,980	2,285	3,037	4,399	15.4%	32.9%	44.8%	122.2%
Pendleton-De Luz	7,531	8,533	8,684	8,797	13.3%	1.8%	1.3%	16.8%
Rainbow	708	750	881	963	5.9%	17.5%	9.3%	36.0%
Ranona	12,376	12,692	14,107	15,140	2.6%	11.1%	7.3%	22.3%
San Dieguito	10,993	11,053	11,924	13,601	0.5%	7.9%	14.1%	23.7%
Spring Valley	20,533	20,939	21,837	21,852	2.0%	4.3%	0.5%	6.9%
Sweetwater	4,670	4,657	4,732	4,732	-0.3%	1.6%	0.0%	1.3%
Valle De Cim	15,543	15,648	16,022	15,968	0.7%	2.4%	-0.3%	2.7%
Valley Center	6,638	7,627	9,795	13,411	14.9%	28.4%	36.9%	102.0%
Unincorporated Area	470,608	490,431	202,892	222,890	5.8%	12.4%	9.9%	30.6%
San Diego County	1,158,076	1,262,458	1,369,807	1,528,050	9.0%	8.5%	11.6%	32.0%

SOURCE: SANDAG Profile Warehouse: 2050 Forecast

Please note that the Lilac Hills Ranch project is a General Plan Amendment, and is not included in the estimate of projected Housing Units in Table 1-1, which is based on the August 2011 San Diego County General Plan.

For the entire County of San Diego, Housing Units are increasing 32% from 2010 to 2050.

Valley Center Housing Units as reflected in the August 2011 General Plan are growing 102% from 2010 to 2050, **more than 3 times** the rate of the County overall. This growth is largely in the North and South Villages, which are located where

C1c-7 cont.

C1c-8

C1c-8

The commenter makes a statement about the project relative to growth projections in San Diego County. The comment states that growth is largely located in the North and South Villages where suitable infrastructure is located. In addition, there is no provision in the General Plan to provide the infrastructure required for a remote site such as the project. Therefore the two villages in Valley Center is the logical place for providing fair share housing for the County.

There are numerous policies in the General Plan that will assure that the project will provide the infrastructure needed to serve the project. These policies include Policy 9.4 that require infrastructure improvements be prioritized to provide public facilities for Villages and community cores that are sized for the intensity of development in such areas. Infrastructure improvements will follow the phasing plan outlined in the Lilac Hills Ranch Specific Plan. This will ensure that adequate infrastructure is available to each phase of development at the appropriate time as required to implement Policy 9.4. The project would be responsible for the construction/ improvement of roadways and provision/extension of public facilities, which would be sized to serve the project's population. See also the discussion in the FEIR regarding the transportation system network, sewer and schools at subchapter 2.3, 3.1.7, and 3.1.5, respectively and Appendix W regarding General Plan Policy conformance.

As stated in C.1c-6 above, the two sites designated as Villages in the Valley Center Community Plan pose constraints as compared to the location of the proposed project. The two Village sites designated by the Community Plan are located substantially further from regional facilities and would therefore, development in these locations would likely result in greater VMT and in turn, greater operational GHG emissions. Additionally, the intensity of proposed use within the Village sites would likely result in significant traffic impacts to local roadways. Both Villages are located adjacent to Valley Center Road. Pursuant to the County General Plan FIER, table 2.15-21, all of the segments of Valley Center Road near the Villages (from Sunday Drive to Paradise Creek Road) would operate at an LOS E or F (failing) at build-out. Only one segment of Valley Center Road (Miller Road to Indian Creek Road) would be permitted to operate at an LOS F at build-out, pursuant the General Plan Mobility Element Network Appendix for Valley Center.

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suitable infrastructure (Roads, Sewers, Schools) is located in Valley Center. There are no provisions in the General Plan to provide the requisite infrastructure in the remote proposed site of Lilac Hills Ranch to support urban village land use densities. The two central Villages in the San Diego County General Plan and the Valley Center Community Plan located in the traditional town center is the logical place for Valley Center to provide more than its fair share of housing for the County.

Bonsall Housing Units as reflected in the August 2011 General Plan are growing 59% from 2010 to 2050, **nearly 2 times** the rate of the County overall. Growth is also planned at the traditional town center, close to the intersection of SR-76 and Mission Road, where necessary infrastructure for dense, urban development is either on the ground or planned (and funded) to be added shortly.

The combined effects of adding Lilac Hills Ranch in addition to General Plan growth is provided in Table 1-2 below:

Table 1-2 Bonsall and Valley Center Composite Housing Unit Analysis

	Housing Units				% Growth from 2010		
	2010	2020	2030	2050	2010 to 2020	2020 to 2030	2010 to 2050
Bonsall	3,875	4,320	5,149	6,151	11.5%	19.2%	58.7%
Valley Center	6,638	7,627	9,795	13,411	14.9%	28.4%	102.0%
Subtotal General Plan	10,513	11,947	14,944	19,562	13.6%	25.1%	86.1%
Lilac Hills Ranch (LHR)		746	1,746	1,746			
Total GP with LHR included	10,513	12,893	16,690	21,308	22%	29.5%	102.7%
Reference: SD County growth	1,158,076	1,262,488	1,369,807	1,529,090	9.0%	8.5%	32.0%

Accretive states that the Project is "in close proximity" to the I-15 freeway. Reality is that the granite hills require a twisting, slow 1 ½ mile trip to I-15 south and 3 miles north to I-15 North, from the closest northern point of their development.

From the south at Circle R Drive it is 3.0 miles of the lowest grade of public road in the County to reach I-15 at Gopher Canyon.

C1c-8 cont.

C1c-9

C1c-10

C1c-8 (cont.)

Therefore, improvements would be necessary to increase capacity to local roadways to serve the two Village sites in the Valley Center Community Plan, which would likely result in other significant impacts (biological, cultural, etc.). Thereby, this alternative site location would not reduce any traffic – or likely other - impacts associated with the project.

C1c-9

The comment refers to growth projections for Bonsall and makes reference to the planned growth in the center of Bonsall This comment provides a table that adds the proposed project population to the projected growth for Bonsall and Valley Center, demonstrating an increase in the total projected growth for these two communities with the project. However, the population projections for Bonsall and Valley Center represent projections of growth and not actual growth. See also response to comment C1c-6 above.

C1c-10

The comment expresses an opinion that the project is not in close proximity to the I-15 due to the quality of the roads that must be traveled to reach I-15. To clarify, the distance to the northbound on ramp to the I-15 is 1.8 miles and not 3 miles as stated in the comment. Furthermore, the FEIR demonstrates that West Lilac Road, the main roadway that would provide access to I-15, would operate at an acceptable level of service. Regarding the ability of the roadways to support the proposed traffic, The project includes numerous improvements to area roadways both as design features and required as mitigation measures. Specifically, as detailed in subchapter 1.2.1.4, the project includes the construction of a number of off-site roadway improvements to several roadway segments in the project's vicinity (Please refer to comment C1c-18 below) and with the implementation of mitigation measures identified throughout subchapter 2.3 of the FEIR, direct impacts to roadway operations would be reduced to a less than significant level (that is, roads would continue to operate at acceptable levels).

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The proposed LHR Project is a classic urban sprawl development. All of the transportation will be via automobiles, and the road infrastructure does not support the 9 fold increase in traffic.

C1c-10  
cont.

The LHR project is not needed for the County of San Diego to meet the growth requirements defined in the August 3, 2011 San Diego County General Plan either for Valley Center, Bonsall, the entire Unincorporated area of San Diego, or the entire County of San Diego.

C1c-11

The ONLY mass transit that exists is the North County Transit District (NCTD) Bus Routes 388 and 389 (Attachment A). The closest access is at SR 76 and Old Highway 395, a minimum 4 mile trip north from the project site. These routes run eight times a day and mainly link the Pala, Pauma, Rincon and Valley View Casinos to the Escondido Transit Center. If you are going to a regional shopping center or work center, you must take a 30 minute bus ride to the Escondido Transit Center and transfer to another route. The mass transit system only works if you are a Casino patron.

C1c-12

**Objective 1-b:** "...consistent with the County's Community Development Model..."

This Project is not consistent with the San Diego County Community Development Model. It is Inconsistent with the Community Development Model, and the policies of the San Diego County General Plan that define and support it. Why does the first Objective ignore the guidance and policies of the General Plan?

The General Plan states (San Diego County General Plan: Land Use Framework; Community Development Model, p.3-6): *"The Community Development Model directs the highest intensities and greatest mix of new uses to Village areas, while directing lower-intensity uses such as estate-style residential lots and agricultural and agricultural operations to Semi-Rural areas .... To facilitate a regional perspective the Regional Categories of Village, Semi-Rural and Rural Lands have been applied to all privately-owned lands ..."*

C1c-13

First, as the above statement in the County General Plan makes clear, the Community Development Model is not a moveable abstract concept. The General Plan has already assigned regional categories to the Bonsall and Valley Center planning areas, both of which are defined by the Community Development Model, each with a higher density village core surrounded by lower density semi-rural and rural uses. To have this Project foisted between these two specified communities disrupts the integrity of the Community Development Model and the General Plan that describes it. If the General Plan and the Community Development Model can be so easily and wantonly abrogated, then Village "puzzle pieces" could be dropped into Semi-Rural and Rural lands anywhere in the County, without regard to existing village centers, and pronounced consistent with the Community Development Model.

C1c-10 (cont.)

Additionally, with the implementation of mitigation measures identified throughout subchapter 2.3 of the FEIR, cumulative impacts to roadway operations would be reduced to less than significant level with the exception of Gopher Canyon Road from East Vista Way to Little Gopher Canyon Road and Pankey Road from Pala Mesa Drive to the SR-76. While improvements to these segments could be constructed (build-out to General Plan Mobility Element Standards 4.1B and 4.2B, respectively), these improvements would not be feasible as the cost of construction would not be reasonably proportional to the project cumulative contribution to the segments. With respect to impacts along the I-15, these would remain significant and unavoidable. While there are plans to widen the I-15 between Riverside County and the SR-76 that would mitigate cumulative impacts, there is no secured funding for the improvement and there is no mechanism in place for the County to ensure fair share mitigation would be implemented.

C-1c-11

The commenter makes a statement that the project is not needed to meet the growth projections in San Diego County. The statement is correct in that the project was not included in the growth projections because the proposed densities are not reflected on the current General Plan Land Use Map. (See also response to comment C1c-6 above.) However, the General Plan states that it is intended to be a dynamic document and provides that amendments will be reviewed to ensure that the change is in the public interest and would not be detrimental to public, health, safety, and welfare. (General Plan, page 1-15) General Plan Policy LU-1.2 permits new villages that are consistent with the Community Development Model and meet the requirements set forth therein. Therefore the language in the General Plan clearly allows for future amendments to the Land Use Map and Regional Categories Map. As the comment does not raise an environmental issue, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

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	<p>C-1c-12 The project has been designed to accommodate public transit by providing for bus stops within the Town Center in addition to bicycle and pedestrian features. A location has been reserved within the project site for a future transit stop if the North County Transit District decides to provide service. The Specific Plan describes the interim private transit service that would be provided to connect to public transit. The interim transit service would operate on demand until public transportation is proposed by the local transit district. This information is included in subchapter 2.3 of the FEIR, subchapter 2.3.2.4.</p> <p>C1c-13 The commenter states that the project is not consistent with General Plan Land Use Policy LU-1.2, specifically with the Community Development Model policy criteria. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2.</p>
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LETTER

RESPONSE

<p>Rather, the Community Development Model reflects a complex of planning principles and ideas that are expressed through the General Plan's Regional Categories. It is the assignment of a particular Regional Land Use Category to a particular piece of land that this SP/GPA proposes to amend. The proposal therefore is inconsistent with the Community Development Model. Again, consistency would be achieved only by amending the General Plan to fit the project.</p> <p>• In the General Plan (p 3-7) "<i>Village areas function as the center of community planning areas and contain the highest population and development densities. Village areas are typically served by both water and wastewater systems. Ideally, a Village would reflect a development pattern that is characterized as compact, higher density development that is located within walking distance of commercial services, employment centers, civic uses, and transit.</i>" Are not the Bonsall and Valley Center village cores the centers of the community planning areas that are referenced here? Are they not so designated in the General Plan?</p> <p>• The proposed site is designated not for Village development but for large semi-rural parcels (SR 10 and SR-4). This proposal to plo a Village into the middle of an area that the Community Development Model designates for Semi-Rural and Rural development requires AMENDING the Community Development Model in a way that defeats the intent of the model.</p> <p>• Further, the site abuts SR-4, SR-10 and Rural-40 acreage. The Community Development Model, which has been applied in Bonsall's core and Valley Center's central valley, and which this proposal defies, requires a "feathering" of residential densities from intense Village development to SR-0.5, SR-1, SR-2, SR-4, and so forth.</p> <p>• This SP/GPA is located many miles from areas that the Community Development Model designates for Village development: miles from employment centers, shopping, entertainment, medical services, and civic organizations and activities.</p> <p>• As for infrastructure, there are few existing roads in the area and they are built and planned to service Semi-Rural and Rural development, as is the current plan. Despite proposing intense Village development, the proponents also propose to retain or reduce the capacities of these roads. Water infrastructure presently serves 50 homes and agricultural irrigation. There is no wastewater service.</p> <p>• The intent of the Community Development Model for Villages is to intensify development in existing Villages -- not to create NEW Villages through the destruction of Semi-Rural and Rural lands. The Community Development Model was applied in Valley Center and Bonsall during the General Plan update process. Village boundaries were drawn. Village densities were planned to feather from the commercial and mixed use core to meet the Semi-Rural designations. The majority of the Valley Center community's future development is now planned for the "Village" areas in the center of the Valley Center Planning Area, at the community's traditional</p>	<p>C1c-14 cont.</p> <p>C1c-14</p> <p>C1c-15</p> <p>C1c-16</p> <p>C1c-17</p> <p>C1c-18</p> <p>C1c-19</p> <p>C1c-14 The comment quotes a portion of the General Plan relating to Village areas, with the point of asserting the existing Village areas designated in the Community plans for Bonsall and Valley Center are village cores within a community development model.</p> <p>Regardless whether existing village areas are considered the centers of these communities, the General Plan allows for the designation of new villages that meet the criteria of LU-1.2. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this matter. There are numerous policies in the General Plan that also contemplate that future growth will occur and provide direction with respect to its future planning, such as M-2.1 (require development projects to provide road improvements), M-3.1 (require development to dedicate right-of-way), S-3.1 (Require development to be located to provide adequate defensibility) and COS-2.2 (Requiring development to be sited in least biologically sensitive areas).</p> <p>C1c-15 Please see response to comment C1c-14 above. The Community Development Model is a major component or principle to guiding the physical planning of the County. (General Plan, page 3-16.) Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2, including with the Community Development Model.</p> <p>C1c-16 The Community Development Model is described on Page 2-8, which states: "the central core is surrounded by areas of lesser intensity including "Semi-Rural" and "Rural Lands." The project includes several methods of transitioning from the denser uses onsite to the less dense uses surrounding the property. These include the use of the biological open space to separate the project from adjacent uses and buffers where adjacent to existing agricultural areas. The Specific Plan also requires the use of wider lots and certain grading techniques to further separate the project from adjacent uses. The project is anchored by a pedestrian-oriented, mixed-use Town Center that includes high-density residential, commercial and professional offices, various private and public facilities, a park and the community trails. Compact residential neighborhoods radiate out from the Town Center towards the project perimeter and support several small parks and the community trails.</p>
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LETTER

RESPONSE

	<p>C1c-16 Neighborhood centers include clusters of attached homes, commercial and professional uses, a 13-acre park and the community trails. The project perimeter transitions to surrounding semi-rural areas by featuring: wider, ranchette-style lots, a 50-foot wide orchard-planted buffer with two rows of orchard trees, and the community trails which include landscaping features. This perimeter buffer is consistent with the transitions, containing “recreation, agriculture and other uses” described on Page 2-8 of the Community Development Model. The road network is densest at the Town Center and there are over sixteen miles of landscaped, lighted, and signed multi-use community trails stitching every part of the community together and connecting to county regional trails. (See Specific Plan, Part V.B., pp. v-7 to v-9.) Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on the related topic of the Community Development Model.</p> <p>C1c-17 This project is not within the assigned villages of Bonsall and Valley Center planning areas of the current General Plan, rather the project would establish a new village through a general plan amendment. Please refer to response to comment C1c-14 above and Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on the related topic.</p> <p>C1c-18 The statements that there are only a few existing roads in the area and the project proposes to reduce or retain the capacities of those roads are incorrect. Please refer to subchapter 2.3 of the FEIR for the analysis the project’s impacts to roads, intersections and Caltrans’ facilities based on the Traffic Impact Study, attached as Appendix E to the FEIR. The project includes numerous improvements to area roadways both as design features and required as mitigation measures. Specifically, as detailed in subchapter 1.2.1.4, the project includes the construction of a number of off-site roadway improvements to several roadway segments in the project’s vicinity. These improvements include the widening, repaving, and restriping of portions of the following existing roadways:</p> <ul style="list-style-type: none"> <li>• West Lilac Road</li> <li>• Covey Lane</li> <li>• Rodriquez Road</li> <li>• Mountain Ridge Road</li> </ul>
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	<p>C1c-18 (cont.)</p> <p>Additionally, the project includes the following intersection improvements:</p> <ul style="list-style-type: none"><li>• Installation of traffic lights at the following intersections: Gopher Canyon Road and I-15 ramps; Highway 395 and Circle R Drive; Highway 395 and West Lilac Road, Highway 395 and East Dulin Road, and Miller Road and Valley Center Road.</li><li>• Dedicated right-turn lanes at the westbound Gopher Canyon Road approach and the northbound East Vista Way approach to East Vista Way/Gopher Canyon Road intersection.</li><li>• Intermittent turn lanes at major access locations along Lilac Road from Old Castle Road to Anthony Road including the segment between Robles Lane and Cumbres Road, and the intersection of Sierra Rojo Road and Lilac Road.</li></ul> <p>Also, as detailed in Chapter 1.0 of the FEIR, the project would provide water and sewer infrastructure to serve the project. The project would be responsible for funding the construction/improvement of roadways and provision/extension of public facilities including wastewater, recycled water, and imported water infrastructure, which would be sized to serve the project's population.</p> <p>Also see Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on the related topic of the Community Development Model.</p> <p>C1c-19 Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this matter.</p>
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Chapter 1: Project Description, Location, and Environmental Setting 7

"crossroads" where road, water and wastewater infrastructure, as well as schools, churches, shops and businesses are already in place.

C1c-19  
cont.

**Objective 1-c:** "...a walkable pedestrian-oriented mixed-use community."

There are two issues with this part of Objective 1. The first issue is that the Specific Plan is so NON-SPECIFIC on what the Commercial, Schools, and Parks content of this Project is that **one cannot assess whether anyone walking would reach a desired service of any kind.**

C1c-20

The second issue is that "walkability" is usually defined as a ½ mile one-way trip. The large majority of the Commercial zoning is in the Northern town center [89%], which is a 1 ½ -mile one-way trip from the southern boundary of the Project. People in the South (1 ½ mile) and Middle (1 mile) of this project won't walk to the town center, and the two small commercial areas planted in the Middle and South to create a façade of "a walkable pedestrian community" are not credible walkable destinations. In fact, this creates Urban Sprawl internal to the Lilac Hills Ranch Subdivision.

C1c-21

Summary and Conclusion – Objective One

It appears the County has structured the first Objective of the RDEIR so narrowly that only the Lilac Hills Ranch Project can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis.

C1c-22

**Objective 2** – The full text is below:

***"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."***

**Objective 2-a:** "...housing and lifestyle opportunities in a manner that encourages walking and riding bikes..."

C1c-23

With 10 exceptions to road standards, the Covey Lane/West Lilac intersection, and the traffic load the Project will throw on internal and external roads, **who is going to risk taking a walk or riding a bike?** The elevation changes [vertical curves] within the Project and the lengthy distances from one end of the Project to the other and to the commercial center will more likely discourage walking and cycling, especially for the senior community residents.

**Objective 2-b:** "...public services and facilities that are accessible to residents of both the community and the surrounding area."

C1c-24

C1c-20 The comment asserts that the Specific Plan does not provide information regarding the project's uses with respect to commercial, schools and parks which make it impossible to determine whether the project is walkable. Section III (C) of the Specific Plan designates the Town Center and Neighborhood Centers as C34 and describe the C34 Use Regulations as authorizing a wide variety of land uses necessary to create the mixed-use neighborhood centers. Section III(L)(1) describes the allowable uses within the Town Center to include single-family attached residential; commercial and residential mixed-use; neighborhood-serving commercial to include a general store; retail shops and services; restaurants, bars, cafes; a Farmer's Market; hotels; fractional ownership of timeshare; resort; restaurants; offices; public uses, religious institutional; post office, schools and library; quasi- public uses such as a day care facility; transit node; utilities necessary to serve the Specific Plan area and other uses as authorized by the C34 Use Regulation. Section III(L)(2) describes how the Neighborhood-serving commercial uses in Lilac Hills Ranch are located in the Neighborhood Centers in the central and southern portions of the Community, which function as secondary commercial and activity centers to provide services within a half-mile walking distance from every home. Allowable uses within the Neighborhood Centers include single-family attached residential, neighborhood-serving commercial; schools; retail shops and services; restaurants and cafes; private recreation facilities; public uses; religious and institutional uses; quasi-public uses such as a day care facility; transit node; post office and library; utilities necessary to serve the Specific Plan area and other uses as authorized by the C34 Use Regulations. The park and school sites are also described in greater detail in Section III(L) of the Specific Plan.

See also the Specific Plan, Section II (B) for a description of the land uses for the project, including the Town Center and surrounding uses. The project's zoning will easily locate at least seven diverse uses within one-half mile of the project's geographic center. Among the diverse uses are the following: a grocery store, farmer's market, bank, coffee shop, bakery, drug store, senior care center, gym, recreational center, school, civic offices, public park, commercial office. Walkability is enhanced by these dense, mixed-uses that are permitted in the Town Center and, the Neighborhood

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	<p>C1c-20 (cont.) Centers. Please see the Global Response: Project Consistency with General Plan Policy LU-1.2 and response to comment C1c-21 below for a discussion of the project's walkability as related to its commercial sites, parks and school.</p> <p>C1c-21 The commenter raises a concern about project walkability. However, the project is compact to encourage residents to walk to amenities and service, as all residential units will be within one-half mile from the Town Center or from one of the two Neighborhood Centers. The wide variety of lot and building designs reinforce an efficient, clustered, and pedestrian oriented design. The project design also intersperses residential uses among predominant swaths of open space, large area of parks, and an extensive community path network thus preserving the natural and scenic qualities of the site, which further encourage walking and biking by providing an inviting, safe setting to walk and ride and, further reduces auto dependence. Please see the Global Response: Project Consistency with General Plan Policy LU-1.2. Also see response to comment C1c-20 regarding the land uses within the Town Center and Neighborhood Centers. The commenter also asserts that the project will create urban sprawl internal to the project. The comment does not provide any explanation, information, specific examples, or other support for this comment.</p> <p>C1c-22 The comment states that the first objective has been structured so narrowly with a planned bias, that only the project would likely fulfill the project leading to a biased environmental analysis. Objective One is not too narrow because the goal of creating a walkable and mixed-use community can be reached in a number of different ways; the project proposal is an example of this objective being met through the compact design encouraging residents to walk to amenities and service, as all residential units will be within one-half mile from the Town Center or from one of the two Neighborhood Centers. The wide variety of lot and building designs reinforce an efficient, clustered, and pedestrian oriented design.</p>
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	<p>C1c-23 The comment raises concerns with respect to hazards associated with the 10 roadway exceptions – asking “who is going to risk taking a walk or riding a bike?” All of the exceptions being requested for the roadway improvements, were included as part of the project’s circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions could be granted by the County where capacity and safety are not unduly affected. (FEIR, subchapter 2.3.2.3, page 2.3-34.) Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that overall the road network design for the project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant. In addition, Section 8 of the Traffic Impact Study analyzed hazards to pedestrians and bicyclists and determined that the project’s trails network will provide connectivity to parks, private recreation, schools, and commercial areas within the project site. All trails should be designed to County standards approved by the County as set forth in the Specific Plan that ensures the safety of pedestrians and bicyclists. In addition, a number of exceptions pertain to the roundabouts that are proposed along West Lilac Road and Main Street. The roundabouts help to calm traffic, improve safety, and increase roadway capacity, thereby enhancing the comfort and safety of both cyclists and pedestrians.</p> <p>With respect to the comment that the elevation changes (vertical curves) and the lengthy distances from one end of the project to the other, will more likely discourage walking and cycling, there is no factual information provided for this assertion. The Project zoning features clustered development, and variety of small lot sizes and residential mixed-use homes in a compact development footprint. The Project is compact enough to encourage residents to walk to amenities and service, as all residential units will be within one-half mile from the Town Center or from one of the two Neighborhood Centers. The Project design also intersperses residential areas with predominant swaths of open space, large area of parks, and an extensive community path network that would preserve the natural and scenic qualities of the site, encourage walking and biking and further reduce auto dependence. (Global Response: Project Consistency with General Plan Policy LU-1.2.)</p>
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	<p>C1c-23 (cont.)          With respect to vertical curves as related to roadways, commenter provides no evidence that the vertical curves would discourage walking and biking. A commercial center or node is located within a 10-minute walk of all residences. As stated above, subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project and to pedestrians or bicyclists. Under this assessment the physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, was considered. The follow project features encourage biking and walking: a mix of land uses located near residences, reduced vehicle design speeds on the roads, and an interconnected trail and path system. Impacts associated with transportation hazards would be less than significant and that the proposed roadway improvements, both internal and external, would be safe for vehicles, bicyclists, and/or pedestrians.</p> <p>C1c-24          The comment asserts that it is not clear or does not provide sufficient information regarding what public services and facilities would be provided by the project.</p> <p>The project will provide all of the necessary facilities and services required to meet the needs of the project as proposed in the Specific Plan. Lilac Hills Ranch is located within the County Water Authority, Valley Center Municipal Water District (VCMWD), Valley Center Pauma Unified School District, Bonsall Unified School District and the Deer Springs Fire Protection District (DSFPD). As detailed in FEIR Chapter 1.0, the project includes parks and recreational facilities, opportunity for an on-site school, internal private road system, storm drain facilities, underground utility lines, water lines, and an on-site water reclamation facility with distribution system, detention basins and wet weather storage ponds. The project includes a looped potable water system and a water reclamation facility that would provide service from the VCMWD. The “<i>Lilac Hills Ranch Fire Protection Plan,</i>” prepared by FIREWISE 2000, Inc., demonstrates that the District has the capacity to provide fire protection services to the project and to the entire DSFPD. The four options described in the FEIR address the need to provide fire services to the project within the response times set forth in the General Plan. The project will, at a minimum, meet the requirements of the Parkland Dedication Ordinance and will include a number of</p>
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	<p>C1c-24 (cont.)</p> <p>small parks within Phases 1-3 and a 13.5 acre public park. As further discussed in FEIR subchapter 3.1.5.2, adequate school facilities exist, or will be deemed to exist after the payment of statutory school impact mitigation fees, to address project needs. As stated in the FEIR Chapter 1.0, a school site will also be available to either school district. (See FEIR, subchapters 1.2.1.3, 1.2.1.5, 1.2.1.7, 1.2.1.9, and 3.1.5.) Possible commercial uses for the project are generally discussed at FEIR subchapters 1.2.1.3 and 2.3.2. (Please see response to comment C1c-20 above for more information on the topic of commercial uses of the project.) Finally, the project would provide all necessary infrastructure for water, wastewater and fire. Water and wastewater service for the project is discussed in the FEIR, subchapter 3.1.7.</p>
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<p>There are two issues with this statement.</p> <p>The first issue: what are the public services and facilities in this Project? A vague statement about a K-8 school site without any commitment to financing or endorsement by either School District, a vague description of the minimum acreage of Parks the County requires? Does the undefined Commercial content include just a general store with some groceries or will there be a supermarket? A restaurant of any kind? A retail gasoline service station? How can the commercial area be evaluated without an inkling of what kind of boutique shops will be provided to support the Project residents?</p> <p>The second issue: "accessible to residents of both the community and the surrounding area" – Accretive's Traffic Impact Study does not show an influx of non-residents to the area. <b>Is this because the Applicant is overly optimistically portraying the true Traffic Impact of this Project?</b></p> <p><b>Summary and Conclusion – Objective Two</b> The project does not meet its own Objective Two.</p> <p><b>Objective 3</b> – The full text is below:</p> <p><b><i>"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."</i></b></p> <p>We do not have any issues with this Objective other than to state that any project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) would have to comply with this Objective. However, we expect more than a vague statement about the minimum acreage of parks that the County requires.</p> <p><b>Objective 4</b> - The full text with comment areas highlighted is below:</p> <p><b><i>"Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff."</i></b></p> <p>There are three issues with this Objective.</p> <p><b>Objective 4-a:</b> The first issue is that the entire Objective is <b>so vague and subjective that compliance is not measurable.</b></p> <p><b>Objective 4-b:</b> <i>"Integrate major physical features into the project design, including major drainages, and woodlands..."</i></p>	<p>C1c-24 cont.</p> <p>C1c-25</p> <p>C1c-26</p> <p>C1c-27</p> <p>C1c-28</p> <p>C1c-25</p> <p>C1c-26</p>
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RESPONSE

	<p>C1c-27 The comment states that the project’s Objective 4, which states integrate major physical features into the project design, including major drainages and woodlands creating a hydrologically sensitive community in order to reduce urban runoff,” is too vague and subjective. The project objectives, developed by the County, are compliant with CEQA Guidelines Section 15124(b). Please see response to comment C1c-1 above. Objective 4 is not vague and subjective in that there are a number of ways in which projects may incorporate low-impact development techniques to preserve natural drainages and minimize concentrated hydrological flows that are based upon measures that will reduce urban runoff in compliance with local, state and federal requirements. CEQA Guidelines § 15126.6(a) provides that an EIR shall describe a range of reasonable alternatives to the project . . . which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project. . . .” Project Objective 4 does not limit the project’s ability to implement the project through a reasonable range of alternatives. A reasonable range of alternatives was discussed in the DEIR that could meet this objective; the Reduced Footprint (Subchapter 4.5.), General Plan Consistent Alternative (Subchapter 4.4.) and the Reduced Intensity Alternative (Subchapter 4.6).</p> <p>C1c-28 The comment asserts that the project does not integrate major physical features the project design including major drainages and oak woodlands. The County does not agree that the project does not meet this objective. The major drainages onsite are preserved within the proposed onsite biological open space. In addition, the project preserves all but 0.3 acres of the onsite coast live oak woodland within the onsite biological easement. See also response to comment C1c-29 below for details regarding how the project would avoid increases in storm water runoff, increases in velocity, and siltation. In addition, the project would implement a Resource Management Plan for ongoing management of the biological open space, including oak woodlands.</p>
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How is taking 608 acres of Rural Land primarily involved in Agriculture, disturbing 440 acres, and creating large areas of impermeable surfaces consistent with this Objective? The Project includes 83 acres of road surface and 68 acres of manufactured slopes. Is it desirable to increase storm water runoff surface water velocity in concrete channels that increase siltation in the runoff? How does this benefit the woodlands?

C1c-28 cont.

**Objective 4-c: "...creating a hydrologically sensitive community in order to reduce urban runoff."**

From our analysis of the Accretive Hydro-modification Design, we find the design and the applicant's analysis of it, is marginal. This Project requires rainwater collection and storage from rooftops and a total of 23 acres of permeable paving to meet Hydrology requirements with the indicated preliminary design. The truth of the matter is, that Accretive is proposing covering large areas of rural farmland with impermeable surfaces. If the Hydro-modification design is compliant, it achieves compliance only in the most optimistic scenarios and with scant margin. **We are unconvinced that this hydrology plan is as sensitive as portrayed and we believe further analysis is needed.**

C1c-29

**Summary and Conclusion – Objective Four**

The project does not meet its own Objective for Objective Four

**Objective 5** – The full text is below:

***"Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area."***

C1c-30

We do not have any issues with this Objective other than to state that any Project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) would have to comply with this Objective.

**Objective 6** – The full text is below:

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

C1c-31

The mixed-use and senior housing are included in the Project to achieve the densest possible development yield. The applicant has added a 200-bed congregate care facility on top of the 1746 Equivalent Dwelling Units, stating that because there is only one communal kitchen, the huge facility technically doesn't add EDU's.

And, we are reminded again that the Project is not needed to accommodate future growth in San Diego County because the current General Plan has addressed the forecasted growth to 2050 without the Project being considered here. More likely, this Project will over-build the market and depress housing prices.

C1c-32

C1c-29 The comment raises concerns regarding the hydromodification design of the project. As explained in subchapter 3.1.3 of the FEIR, the project's primary mitigation element for project-related storm water discharges is the installation and permanent maintenance of three (3) hydromodification (HMP) mitigation ponds or detention basins. Figure 1-4 of the FEIR shows the location of the detention basins. The Hydromodification Management Plan, Storm Water Management Plan and Preliminary Drainage Studies prepared for the project determined that the proposed detention basins alone would meet water quality requirements and HMP requirements resulting in a reduction of the storm water runoff from the site to be at or less than the pre-development conditions. The project Storm Water Management Plan includes measures that would be implemented to minimize impacts from non-point source pollution, such as: LID strategies that include conservation of natural areas and preservation of significant trees; source control BMPs include storm drain inlets identified and marked, "No Dumping"; landscaping design minimizing irrigation runoff and use of drought tolerant plants and trees; and treatment control BMPs include use of irrigation and bioretention in landscaped areas and detention basins designed to allow for maintenance of runoff increases due to the proposed development, throughout the project site. Table 1-3, Hydrology and Water Quality, identifies all potential site design BMPs, LID requirements, source control BMPs, and treatment control BMPs as detailed in the Major Storm Water Management Plan prepared for the project.

Additionally, the project design is in compliance with the current National Pollution Discharge Elimination System permit and Standard Urban Stormwater Mitigation Plan requirements which will ensure that the project will not cause any additional negative hydrological or water quality impacts to downstream properties and facilities. The permeable pavers in the streets and the rain water capturing systems from future roofs are offered as possible alternatives or supplements to the traditional detention basins and/or as additional project design measures to further reduce the impervious footprint of the project, enhance the hydrologic/water quality sensitivity of the project and allow for a reduction in the size of the proposed hydromodification mitigation ponds. At final engineering, the project will be required to be in conformance with current water quality and HMP requirements. In accordance with Part III of the Specific Plan, each implementing Site Plan shall be

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	<p>C1c-29 (cont.) conditioned to require that buildings shown on the Site Plan are designed to include plumbing for rainwater harvesting systems. Based on the incorporation of this and additional measures that would be utilized in the final design, along with the three permanent detention basins, the project hydrologically sensitive community than is currently required by the County or Regional Water Quality Control Board. As discussed in responses to comments C1c-28 and C1c-29, the project meets project objective 4.</p> <p>C1c-30 The project complies with this objective in that the project design incorporates the preservation of 104.1 acres of open space, the on-site creation of 6.0 acres of wetland habitat for wildlife use, and the enhancement of 12 acres of existing disturbed riparian habitat to native riparian habitat for wildlife use. See FEIR Sections 2.5, 8.0, and Table 10 of the Biological Resources Report. The biological open space being preserved on the project site conserves the local important wildlife corridors. See Figures 14a and 14b of the FEIR, Section 2.5 of the Biology Resource Report.</p> <p>In addition, see Section 8.0 and Table 10 for a summary of impacts and mitigation measures. Mitigation measures will protect raptor foraging habitat, will restore, enhance, and maintain open space subject to a reviewed Resource Management Plan, funded through an endowment or community facilities district, will enhance and create wetlands, under the jurisdiction of local, state, and federal resource agencies, and will include a Revegetation Plan, with numeric success criteria, and subject to local, state, and federal review and approval prior to issuance of wetland and the first and all subsequent grading permits. The comment provides factual background information, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue with respect to the FEIR, no further response is required.</p>
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	<p>C1c-31 The comment asserts that mixed-use and senior housing are included in the project in order to achieve the densest possible development yield. However, the project was designed to be consistent with the Community Development Model. (FEIR, Subchapter 3.1.4.2, Land Use Planning; FEIR Appendix W; and Specific Plan.) The inclusion of smaller, denser homes in the core areas, a senior care facility, and surrounding residential neighborhoods not only provide a variety of housing types but also serve to reduce vehicle distance traveled and automobile dependence, encourage daily walking, biking, and transit use, and support car-free living by providing access to diverse land uses. See also Global Response: Project Consistency with General Plan Policy LU-1.2.</p> <p>With respect to the comment referring to the 200-bed memory care/assisted living facility (not 220 beds), this facility is not counted as a dwelling unit because it is not a single unit, it is a group facility with shared kitchen facilities. The County Zoning Ordinance defines dwelling unit as a single unit providing complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking and sanitation, and having only one kitchen. The assisted living facility does not meet this definition and is not counted in total dwelling units. The trip generation rates were based on SANDAG's Guide to Vehicular Traffic Generation Rates for the San Diego Region. See also Table 2.3-10 of the TIS (Appendix E) that lists the daily trip generation rate utilized for each of the land uses proposed as part of the project.</p> <p>C1c-32 The comment asserts that the project is not needed to accommodate future growth in the County because the current General Plan handles future population growth without the inclusion of the project.</p> <p>Also the comment raises a concern that the project will over-build the market and depress housing prices.</p> <p>The comment asserts that the project is not needed to accommodate future growth in the County because the current General Plan handles future population growth without the inclusion of the project. First, there is no language in the General Plan that could be interpreted to mean that it is intended to limit growth to only those areas that were designated for village uses through the General Plan</p>
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	<p>C1c-32 (cont.)</p> <p>Update process. The General Plan contemplates that amendments would occur from time to time that are in the public interest and to respond to the changing community needs. (General Plan, page 1-15) While population growth and associated development through the horizon year of the General Plan can be considered reasonably foreseeable, the County's population forecast is regional in scale and potential development on any particular parcel would be largely speculative at a general plan level of analysis. (See General Plan Update FEIR, Chapter 1, pp 1-17 and 1-20 ) Thus it is reasonably anticipated that as the General Plan is amended over time, housing forecasts can be adjusted appropriately. Please refer to comment C1c-6 above.</p> <p>With respect to the comment concerning depressing housing prices, this raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p>
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<p>In this Objective, the County re-brands dense Urban Sprawl as a desired attribute. The General Plan Alternate does not meet this objective, because it is not designated for Urban Densities under the current General Plan.</p> <p>This Objective is a further example of the attempt by the County to structure the Objectives of the Project in the RDEIR so narrowly, with a planned bias, that only the Lilac Hills Ranch Project as proposed by the Applicant would likely fulfill the Project Objectives, leading to a self-serving and biased environmental analysis.</p> <p><b>Objective 7</b> – The full text is below:</p> <p><i>“Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.”</i></p> <p>Developing the Project at General Plan densities and preserving agriculture and residential-based businesses (such as the existing Accretive Agricultural Office located on 32444 Birdsong Drive) on the same or nearby Parcels achieves this Objective perhaps better than the Proposed 1746 EDU Accretive Urban Sprawl Project.</p> <p>The community attributes that this objective is seeking to provide, already exist, or will at build-out of the General Plan, in the Bonsall and Valley Center village centers. Yet again, we are reminded that this Project is unnecessary to meet the goals and objectives of the General Plan.</p> <p><b>Summary</b></p> <p>The County has attempted to structure the Project Objectives of the RDEIR, in aggregate, so narrowly that only the Lilac Hills Ranch Project, as proposed by the Applicant, has a chance to fulfill the Project Objectives, leading to a self-serving and biased environmental analysis. Even with that attempt, the County fails to acknowledge that the Project is not needed to achieve the goals and objectives of the San Diego County General Plan and the community plans of Bonsall and Valley Center.</p> <p>Attachment A: North County Transit District Breeze Bus Routes 388 and 389 [appended separately as a stand alone document].</p> <p><b>1.2.1.1 Plan Amendments</b></p>	<p>C1c-33 The comment makes a general statement about the project being urban sprawl without any supporting information. The project is not sprawl, rather it represents a new Village consistent with General Plan Policy LU-1.2 and the Community Development Model. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W. The comment also correctly states that the General Plan Consistent Alternative does not meet this objective.</p> <p>C1c-34 The comment states that the objective to accommodate future population growth by providing a range of diverse housing types has been structured so narrowly with a planned bias, that only the project would likely fulfill the objective, leading to a biased environmental analysis. This objective is compliant with CEQA Guidelines Section 15124(b) and complies with Goal LU-3 to plan for a range of neighborhoods types, suitable for a variety of lifestyles, ages and affordability levels. (See also comment C1c1 above) The primary purpose of the project objectives is to help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision makers in preparing findings or a statement of overriding considerations, if necessary (CEQA Guidelines §15124(b)). The project’s objectives were not so specific as to limit its ability to implement the project through a reasonable range of alternatives. A reasonable range of alternatives was discussed in the DEIR (a total of 9) and the Reduced Footprint (Subchapter 4.5.), and 2.2C Alternative (Subchapter 4.7) was found to comply with this objective.</p> <p>C1c-35 The comment asserts that the General Plan Consistent alternative would achieve this objective better than the project. The County does not agree in that the General Plan Consistent alternative would not provide any educational, recreational or social uses as stated in the objective.</p> <p>The comment also asserts that this objective could be achieved by by the Bonsall and Valley Center Village centers of the General Plan. Although the village centers would accommodate future development, these areas are made up of multiple parcels owned by a number of property owners which could not provide a master planned community that can ensure that educational, recreational, social and commercial uses are located within a walkable distance from residential uses. See also the Specific Plan, Section II (B) for a description of the land uses for the project, including the Town</p>
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	<p>C1c-35 (cont.) Center and surrounding uses. The project's zoning will easily locate at least seven diverse uses within one-half mile of the project's geographic center. Among the diverse uses are included: a grocery store, farmer's market, bank, coffee shop, bakery, drug store, senior care center, gym, recreational center, school, civic offices, public park, commercial office. Walkability is enhanced by these dense, mixed-uses that are permitted in the Town Center and, the Neighborhood Centers.</p> <p>C1c-36 This comment summarizes earlier comments and asserts that the project objectives do not comply with CEQA, the analysis is self-serving and biased and the project does not meet the goals and objectives of the General Plan and Community Plans. See response to comments C1c-36-1, -6, -22, -26, -27 and -34 above.</p>
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This section of the RDEIR is a tricky one. This is the section in which the County identifies the very substantial amendments to existing planning documents that must be made in order for the Lilac Hills Ranch project [the Project] to be approved and considered as consistent with those same documents. Yes, it is tricky. It's analogous to changing the rules in soccer so that the opposing team must play without a goalie in order for your team to win.

C1c-37

The first item to be changed is the Regional Land Use Element Map. This change will convert semi-rural SR-4 [one dwelling unit per 4, 8, or 16 gross acres – slope dependent] and semi-rural SR-10 [one dwelling unit per 10 or 20 gross acres – slope dependent] parcels into village residential VR 2.9 [up to 17 dwelling units per acre] and village core C-5 land uses with commercial and urban densities. These kinds of land uses aren't permitted now in the Lilac Triangle where the Project is proposed according to the current Regional Land Use Element Map. Which is exactly why the General Plan and the Map must be amended to permit the changed land uses.

C1c-38

Further, this change of land uses flies in the face of the Community Development Model as it is applied in Valley Center and Bonsall. In those two communities, the high-density village cores feather out to semi-rural and rural land uses at the margins of both planning areas according to the Community Development Model. Strangely, that is precisely where the applicant is determined to build another village center in complete contradiction to the Model. The logic of such a move is so perverse that it defies explanation. To pursue a high-density urban community precisely where the Community Development Model places very low density rural land uses is astonishingly audacious. One explanation for the move is that the applicant has intended to remove the General Plan goalie by changing the Regional Land Use Element Map to allow an urban development on green field, agricultural lands expected to buffer the village centers of Valley Center and Bonsall. What is the County's purpose in allowing such a misplaced Project to advance through the approval process when it is predicated on such inane logic?

C1c-39

The second change to be made is to the Valley Center Community Plan [VCCP] Map [a component of the General Plan]. The land uses must be changed from rural uses to urban uses and to allow a third village within the planning area for this Project to advance. There is no other way for the Project to be consistent with the VCCP Map except to modify it to conform to the Project. This is not planning. We in Valley Center have the understanding that projects should conform to the General Plan and the community plan, not the other way around. Is this not the County's understanding? And, if not, why not?

C1c-40

The third change is similar to the second except the bald faced affront is to the Bonsall Community Plan Map. Again, it is the plan conforming to the Project rather than the other way around. And this Project is replete with significant impacts that must be explained away in order to move forward.

C1c-41

C1c-37 This is an introductory comment to those that follow. The general issues raised are addressed in detail in the following comments.

C1c-38 The commenter makes a statement about project consistency with the General Plan. The commenter is correct that the proposed project requires an amendment to the General Plan. The General Plan is intended to be a dynamic document and allows for the establishment of new villages that meet the requirements of Policy LU-1.2. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W for a thorough discussion on related topic.

C1c-39 The commenter disagrees that the project is consistent with the Community Development Model and with the Valley Center and Bonsall Community Plans. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W.

C1c-40 The comment is correct that the project requires an amendment to the land use map in order to approve the project. This is part of the proposed General Plan Amendment. However, as detailed in the Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W, the General Plan Amendment would be consistent with the goals and policies of the General Plan.

C1c-41 As detailed in subchapter 3.1.4.2 and Appendix W of the FEIR, the project would be consistent with the goals and policies of the Bonsall and Valley Center Community Plans. The project incorporates various design features that will achieve compatibility with the community and retain the rural character of the community. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes (Bonsall Policy LU-1.1.1; Valley Center Goal 1A).

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	<p>C1c-41 (cont.)</p> <p>Additionally, the project's grading guidelines ensure natural topography is adhered to by applying refined grading techniques (Bonsall Policy LU-1.1.3; Valley Center Goal B-4). As detailed in the project's Specific Plan, Sections II and II, project design guidelines for landscaping and architecture contain rural-themed concepts. The Specific Plan includes illustrations to show the rural village theme expressed in all land use contexts, including commercial. (Bonsall Policy LU-4.1.1; Valley Center Goal 1A). Through application of these design and grading guidelines the project would be consistent with goals and policies associated with the rural character of the development as expressed in the community plans.</p> <p>The significant and unavoidable impacts of the project have been thoroughly disclosed throughout Chapter 2.0 of the FEIR and are summarized in Table S-1.</p>
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<p>The final change is to the General Plan Mobility Element road classification of West Lilac Road from 2.2C to 2.2F along the Project's northern border. The current plan for that section of West Lilac Road is a 2.2C road. A 2.2C road is a two-lane road with intermittent turn lanes, 8-foot shoulders, bike lanes and a pedestrian path. The request to down grade the road classification to 2.2F would make it a two-lane road with virtually no shoulders, bike lanes or turn lanes. The 2.2F would be less costly to build because it would require fewer features and the taking of less private land by eminent domain. However, since the County depends on developers to build new roads and improve existing ones as a condition of development, why would the County consider a downgrading of the standards for this section of West Lilac Road?</p>	<p>C1c-42</p>	<p>C1c-42 The commenter is not correct that the proposed 2.2F classification along the northern project boundary would result in no shoulders, bike lanes or turn lanes. Figure 25 of the specific plan shows the proposed improvements which includes a 4-foot shoulder along the southern side of the road and an 8 foot multipurpose trail that would accommodate both pedestrians and bicyclists. Ultimately the Board of Supervisors will have the discretion as to the classification and improvements that would be required. The FEIR evaluates both the proposed 2.2F classification and a 2.2C classification along the Northern Project Boundary in the Road Design Alternative included in Chapter 4.0 of the FEIR. This segment would have a design speed of 40 Mph.</p>
<p>Not only will the size of the road be reduced, but, so will its design speed, from 40 mph to 25 mph. Why would the County consider reducing the design speed of West Lilac Road so drastically given its significance as a Mobility Element Road and its importance as a community evacuation route? Slowing traffic by design seems counter intuitive to the need for moving evacuation traffic along at a brisk pace to avoid unnecessary traffic jams during an emergency.</p>		<p>The 25 Mph design speed referenced by the commenter would occur at a short segment of West. Lilac Road from the western roundabout to Northern Project Boundary (Road Standard 2.2C). Refer to Table 1-2 in Chapter 1.0 of the FEIR for details about the proposed road standards, including exception requests.</p>
<p><b>1.2.1.2 Rezone</b></p>		
<p>To effect the transformation of the Project site into the Project itself, it will be necessary for the County to rezone the rural, agricultural Project site from A-70 [limited agriculture] and RR [rural residential] to RU [urban residential] in most of the Project and C34 [general commercial-residential] in the "town center" and the two neighborhood centers." How does the County resolve the location requirement found in LEED-ND [Leadership in Energy and Environmental Design – Neighborhood Development] with the transformation of green field agricultural land to urban residential and commercial? How can the Project qualify under the Community Development Model with essentially a single urban zoning?</p>	<p>C1c-43</p>	<p>C1c-43 The comment reiterates the general project description and raises concern about how the project would meet certain requirements of LEED-ND. Refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for details on how the project is equivalent to LEED-ND, including the location requirements.</p>
<p><b>1.2.1.3 Specific Plan</b></p>		
<p>The Project is requesting the creation of a specific plan area [SPA] as part of the entitlements it is seeking. Under the rules for SPAs, the Project would be governed in terms of land use, densities, phasing, maximum number of residential units, improvement plans and other aspects of development by the rules proposed in the Specific Plan rather than the County's General Plan and the Community Plans. This would remove the Project from having to deal with the community and its goals and objectives and would leave the Project in the control of a homeowners association [HOA]. Does the County find that governance by HOA is superior to governance by the County? What provisions will be required by the County to assure that the HOA will endure within the Project, given the uneven record of HOA failures?</p>	<p>C1c-44</p>	<p>C1c-44 Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2, which addresses conformance with the Community Development Model.</p>
<p>The Specific Plan identifies the five phases of development of the Project but fails to</p>	<p>C1c-45</p>	<p>C1c-45 Specific Plans are required to be consistent with the General Plan; as such, the project Specific Plan incorporates goals and policies that reflect the policies in the General Plan and applicable Community Plans. Authority over implementation of the project would remain with the County, not the HOA. For example, future site plans would be at the discretion of the County and would be provided to Community Planning Groups for recommendations in accordance with existing County practices for Community Planning Group review of discretionary permits. The County, not the HOA would be responsible for ensuring all required mitigation and project design is implemented.</p>
	<p>C1c-46</p>	

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	<p>C1c-46 Commenter raises a concern about project phasing and Specific Plan implementation. The project is designed so that each phase of construction would trigger specific mitigation measures; however the commenter is correct in that there is no requirement that all phases of the project will be constructed. However, all utilities and service systems would be required as each phase is developed. Should the General Plan Amendment be approved, that change would not have any expiration date for implementation. However, as Tentative Maps are proposed and approved, those approvals would be subject to standard expirations as defined in the subdivision map act.</p> <p>As detailed in the Specific Plan, Part IV Implementation, the project phasing provides for flexibility to allow for market variability. The project phasing plan does not require the town center to be operational within one year of completion of phase 1. All required infrastructure such as roads and sewer to serve each phase would be provided concurrent with development.</p>
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specify any timetable for development of any phase except to indicate an approximate duration of the build out of each phase. Further, the Specific Plan notes that the phases will not necessarily be built in numerical sequence. Does the County have any assurance that once the entitlements to build are granted, that any of the phases will actually be built? Are there any penalties for failing to build all the phased components as outlined in the Specific Plan? Will the entitlements have any kind of expiration date? Will the "town center" be built and operational for the benefit of the first phase of residences within a year of completion of phase one? If phases 4 and 5 are built before phases 2 and 3, will the complete complement of infrastructure, other than a 'town center' be built to coincide with that development or will completion systems such as sewers and roads have to wait for development of the other two phases?

C1c-46 cont.

The Specific Plan cites four options for wastewater treatment. Why hasn't one option been adopted for the Project by now? This Project has been in planning for many years and still there is no definitive plan for wastewater treatment. The decision apparently has been delegated to the Valley Center Municipal Water District [VCMWP], but still there is no single plan. Are there specific impediments to the execution of any or all of the optional plans? The Specific Plan and RDEIR fail to adequately address the use of tank trucks to haul wastewater to the Lower Moosa Canyon Water Reclamation Facility. How long will wastewater be trucked from the Project and has the impact of that trucking operation been incorporated into the traffic study for the Project? Phase three is represented as the site for the wastewater reclamation facility. If phase three is built last among all the phases, will wastewater for the other four phases continue to be trucked off-site until phase three is underway? If market conditions are not favorable for the development of phase three, how long is the County prepared to wait for completion of the Project and a wastewater solution?

C1c-47

1.2.1.4 Circulation

The RDEIR and Specific Plan continue to refer to Mountain Ridge Road, a private road that does not meet current County private road standards, as the southern access point for the Project. Has the County evaluated that road and the increased traffic burden that will be placed on it in terms of overburdening the private road for the existing easement holders? This same road is the subject of eminent domain under some scenarios. Is the County willing to use eminent domain on private property for the benefit of a private developer? Even with the presence of the Project, there appears to be no public good served by confiscating the private easement. The only advantage in such a seizure is to the Project and its developer. Should the easement holders of Mountain Ridge Road be penalized for the failure of the applicant to obtain secondary access for his Project? The same question applies for sewage and recycled water easements optioned along a confiscated public Mountain Ridge Road. Should the private easement holders have to sacrifice for the needs of a private developer?

C1c-48

C1c-49

The same questions arise in connection with the likely use of eminent domain on portions of West Lilac Road. Improvement of West Lilac Road to current County standards [2.2C] will require the taking of land from about 20 private parcels along the

C1c-50

C1c-47 The wastewater option that is selected would be determined by the VCMWD. VCMWD has conceptually approved the Wastewater Management Report for Lilac Hills Ranch which provides additional information about all treatment options. As stated in the project Description (Chapter 1.0), if one of the on-site wastewater treatment scenarios is selected, the project would require temporary trucking of sewage during the initial phases of the project. This is necessary because a minimum wastewater flow is needed to operate an on-site WRF. For an on-site permanent WRF, trucking would be required for up to the first 100 homes (approximately three truck trips per day) to allow for a sufficient minimum flow to operate the facility. For a smaller on-site interim WRF, trucking would be required until as few as 25 homes are occupied. In either case, as soon as sufficient flows are available, trucking operations would cease. Truck trips associated with interim hauling of wastewater would be associated with temporary trips on surrounding roadways. As specified in section 11.1 of the Traffic Impact Study included as Appendix E to the FEIR, "the project is expected to generate 6 truck trips (equivalent to 15 vehicle trips) per day from waste water transport activities between the project site to the Moosa Water Reclamation Facility located along Circle R Drive, just east of Old Highway 395. Note that this waste water transport activity only happens for the first 100 units, after which a temporary line from the project site down to the Moosa facility will be construed via Mountain Ridge Road to Circle R Drive."

Regarding timing of construction of the on-site Water Reclamation Facility, it does not have to be constructed concurrent with Phase 3, as the on-site Water Reclamation Facility is subject to a separate approval of a Major Use Permit. Prior to Final Map recordation and issuance of building permit for development of the project, the project will be required by the County to obtain a service commitment letter from the wastewater provider.

C1c-48 through C1c-50 Subchapter 2.3 of the FEIR provides the analysis the project's impacts to roads, including Mountain Ridge Road, intersections and Caltrans' facilities and is based on the Traffic Impact Study, attached as Appendix E to the FEIR. A complete synopsis of the Significant Direct and Cumulative impacts related to the project can be found in subchapter 2.3.S.1. Table 2.3-24 and Table 2.3-25 provide a mitigation summary for the direct and cumulative impacts,

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	<p>C1c-48 through C1c-50 (cont.)</p> <p>respectively, for the project. However, the need for easements and use of eminent domain is not an environmental issue under CEQA as obtaining easements would not result a physical change in the environment. Nonetheless, parcels with legal access rights to Mountain Ridge Road are disclosed for informational purposes in Table 4-9. APNs are shown on Figure 4-17 and 4-18. The FEIR adequately discloses all physical environmental impacts that would result from off-site improvements, including those that may require the use of eminent domain. In addition, the applicant has the required easements needed to construct required improvements of Mountain Ridge Road as a private road. Refer to Global Response: Off-site Improvements – Environmental Analysis and Easement Summary Table for additional details about the easement rights and the adequacy of the environmental analysis in relation to easements. With respect to the use of Eminent Domain, ultimately it is in the discretion of the Board of Supervisors to decide whether to initiate proceedings to acquire additional easements should any of the project alternatives be selected that require easements not held by the project applicant.</p>
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<p>northern border of the Project. Likely it will require the demolition of two residences as well. Without the presence of the Project, these takings would not be necessary since the rural population would continue to be small and would not overburden the existing roadway. With the Project, widening the road would become necessary, given the 20,000+ Average Daily Trips that would be added by the Project.</p> <p>The intersection of Covey Lane and West Lilac would also require eminent domain takings. The proposed changes to the intersection will create a requirement to encroach on private parcels for turning radii and sight lines. Why must private land owners sacrifice for the benefit of the developer?</p> <p>The applicant also seems resistant to adequately improving the roads that future residents of their Project will overburden. The applicant seems to prefer to downgrade the capacities and design speeds of existing roads rather than address the traffic volumes their project will add to existing volumes with meaningful improvements. Is not the County's position on road improvements in connection with development that it is the developer's responsibility to make the needed improvements? Will improving roadways like West Lilac Road to less than the previously recommended standards serve the public interest concerning improved roadways for daily transit and emergency evacuation?</p> <p>The ten exceptions to the County's road standards requested by the applicant will diminish the capacities and design speeds of the affected roads, both public and private. It seems that the requested exceptions are not for the public good, but merely to facilitate the Project at a lower cost. Why would the County consider such a diminishment of public and private roads?</p> <p>Exceptions for the public West Lilac Road along the northern Project boundary, rather than building it to the previously required 2.2C design with intermittent turn lanes for intersections and driveways and eight-foot shoulders, bike lanes and paths, would allow it to be downgraded to a 2.2F designation, lacking turn lanes, bike lanes, paths and having a minimal four-foot shoulder on only one side. That is not the kind of developer fronted road "improvement" that is anticipated from such a large project. What public interest is served by allowing such a downgrade from the otherwise expected standards for improvement? And, rather than resort to eminent domain to obtain additional right-of-way, why isn't the road realigned to traverse the applicant's property to a greater degree as a condition of approval?</p> <p>The same concern exists for West Lilac Road from Running Springs Road northwesterly to the Project boundary. For what public interest would the County consider the downgrading of this segment of a Mobility Element road from a 2.2C to a 2.2F designation? Are there expectations that Road 3 will actually be built through Lilac Ranch, which is now a conservation area as a result of CalTrans' mitigation for the widening of State Highway 76. Given the importance of West Lilac Road to both Bonsall and Valley Center as one of few routes of evacuation to Interstate 15, why would the County allow the applicant to restrict traffic flow by downgrading this road anywhere</p>	<p>C1c-51 This comment makes a general statement about the ADTs generated by the project. Project generated ADT for each roadway segment at build-out are provided in Table 2.5 of the FEIR.</p> <p>A complete synopsis of the Significant Direct and Cumulative impacts related to the project can be found in subchapter 2.3.S.1. Table 2.3-24 and Table 2.3-25 provide a mitigation summary for the direct and cumulative impacts, respectively, for the project.</p> <p>C1c-52 Please refer to the Global Responses: Easements (Covey Lane and Mountain Ridge Road) and Environmental Analysis and Easement Summary for details.</p> <p>C1c-53 The design exceptions that are being proposed (final recommendations of the requests are pending) as part of this project are described in Figures 1-4A and 1-4B. The resulting effects on roadway capacity of each of the design exceptions are also described the TIS. All of the exceptions being requested for the roadway improvements, were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions could be granted by the County where capacity and safety are not unduly affected. (FEIR, subchapter 2.3.2.3.) Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that overall the road network design for the project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant.</p> <p>None of the proposed exception requests to road standards would affect the capacity of the roadways, including Mountain Ridge Road in which it was concluded that Mountain Ridge Road could accommodate the project's 1,190 ADT. (Subchapter 1.2.3 of the TIS, attached as Appendix X) The project also includes a Road Design Alternative in Chapter 4.0 of the FEIR that evaluates the proposed project without each of the exception requests. Ultimately, the Board of Supervisors will decide whether to approve the proposed project or one of the project alternatives.</p>
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LETTER

RESPONSE

	<p>C1c-54 The commenter raises concern about the adequacy of roadways for daily transit and emergency evacuation. None of the proposed road modifications would affect roadway capacity or hinder emergency evacuation. Refer to response to comment C1c-55 and C1c-56.</p> <p>C1c-55 The proposed roadway exceptions would not affect road capacity. As detailed in Table 1-2 of Chapter 1.0 of the FEIR, 4 of the 10 proposed roadway exception requests would affect design speed. Two of those roads are internal to the project site. The purpose of the exceptions requests are not to facilitate the project at a lower cost, rather they are largely to avoid impacts to surrounding properties and to support traffic calming measures.</p> <p>C1c-56 The commenter raises concern about exceptions to road standards and potential resulting hazards and impacts on evacuation routes. All of the exceptions being requested for the roadway improvements were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions could be granted by the County where capacity and safety are not unduly affected. (FEIR, subchapter 2.3.2.3.) Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that overall the road network design for the project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant. The Lilac Hills Ranch Evacuation Plan identifies four points of ingress/egress that would be used for evacuation which will not be negatively impacted by the road standards exceptions. Therefore, County approval of these road standard exceptions would not reduce the safety and availability of the road for evacuation purposes. See Evacuation Plan, attached as Appendix K to FEIR. Please also refer to response to comment C1c-42.</p>
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along its length?

Even the private roads proposed for the interior of the Project are unable to function properly without an exception to the road standards. When proposing a new development, it seems odd that the applicant would even consider an exception to the standards since they are in place to provide safe and efficient transportation to the public. Asking for exceptions for new roads begs the question of why the applicant can't engineer the roads to avoid the necessity of an exception to the standards? The Project is proposing to move over 4 million cubic yards of earth to accommodate the development, and one would think they could manage to create roads with appropriate grades.

In the RDEIR, there continues to be uncertainty about the Main Street alignment through the town center in phase two. The excuse is that there is market uncertainty that affects whether it will be a couplet design or a standard road. This uncertainty makes an analysis of the road uncertain as well. Too many times in the RDEIR are elements of the Project uncertain and reviewers are left with a collection of options that can be assembled in innumerable ways to reach whatever will be the final project. It's a pig in a poke.

While the applicant cites the Project's features as presenting an 'opportunity' for public transportation, there continues to be no solid offering of public transit within the Project. We are left with the possibility that North County Transit District may choose to provide a stop within the Project. How is this Smart Growth? Projects such as this should be built where transit facilities are at hand. Not providing transit options for over 5 thousand residents will condemn them to commuting great distances to work and shop.

The notion that the Project is walkable, or even bikeable, is laid to rest by the two-mile length, the one and half-mile width and the serious elevation changes within the project. The senior housing and senior care facility is farthest from the designated town center, making the seniors travel the full length of the Project up hill all the way. Most of those seniors will be driving through the project.

**1.2.1.5 Parks & Recreation**

LaVonne's comments here

**1.2.2 Technical, Economic, and Environmental Characteristics**

**THIS SECTION NEEDS THE ADDITION OF A FRANK AND SUCCINCT DISCUSSION OF THE PROJECT'S FACTUAL LACK OF LEGAL RIGHT OF WAY FOR ROADS, SEWER, AND RECYCLED WATER. FACTUAL AND QUANTITATIVE DISCUSSION NEEDS TO BE MADE PROMINENTLY APPARENT TO DECISION MAKERS ON HOW OFFSITE IMPROVEMENTS REQUIRED FOR THIS PROJECT WILL BE ACQUIRED. THERE ARE FACTUALLY 30 OR MORE RIGHT OF WAY ACQUISITIONS THAT PROJECT REQUIRES. THE PROJECT HAS MADE LITTLE PROGRESS IN FOUR**

C1c-56  
cont.

C1c-57

C1c-58

C1c-59

C1c-60

C1c-61

C1c-57 All of the private roads internal to the project site are designed to accommodate project traffic and function adequately. The exception requests internal to the project site are largely for purposes of traffic calming to support the project design as a walkable community. County Road Standards allow for exception requests. Exception requests are not approved by the County if they would compromise safety. The comment also makes a comment about the grades of proposed roads. None of the roadways internal to the project require exceptions due to the proposed grade of the roadway.

C1c-58 The FEIR Project Description in subchapter 1.2.1.4 identifies the proposed couplet design for Main Street as the intended road design for the project; however, it also indicates that the couplet design may not be implemented depending on economic factors. The ultimate road design would be resolved with implementation of the Phase 2 Final Map. The FEIR adequately addressed both possible road designs for Main Street in the event the couplet is not implemented with the Phase 2 Final Map.

C1c-59 The comment raises concerns about the project access to mass transit. A location has been reserved within the project site for a future transit stop if the North County Transit District decides to provide service. An interim private transit service would be provided that connects to public transit. The interim transit service would operate on demand until public transportation is provided by the local transit district. This information is included in subchapter 2.3 of the FEIR, subchapter 2.3.2.4. The project includes a Transportation Management Plan that requires the long-term coordination with regional transportation agencies. See also Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic.

C1c-60 The comment raises concerns about whether the project is walkable. Refer to response to comment C1c-20. In addition, it should be noted there is a mixed-use Neighborhood Center almost adjacent to the senior care facility.

LETTER

RESPONSE

	<p>C1c-61 The commenter raises concerns about easements rights with respect to the project and project alternatives. The need for easements and use of eminent domain is not an environmental issue under CEQA as obtaining easements would not result a physical change in the environment. Nonetheless, please refer to the Global Responses: Easements (Covey Lane and Mountain Ridge Roads) and Off-site Improvements - Environmental Analysis and Easement Summary Table for additional details about the easement rights and the adequacy of the environmental analysis in relation to easements. The FEIR adequately discloses all physical environmental impacts that would result from off-site improvements, including those that may require the use of eminent domain. With respect to the use of Eminent Domain, ultimately it is in the discretion of the Board of Supervisors to decide whether to initiate proceedings to acquire additional easements should any of the project alternatives be selected that require easements not held by the project applicant.</p>
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**YEARS ON ACQUIRING REQUIRED RIGHT OF WAY. IT IS HIGHLY LIKELY THAT THE USE OF EMINENT DOMAIN FOR A MINIMUM OF THIRTY AND LIKELY GREATER NUMBER OF SEPARATE TAKINGS OF UNWILLING PROPERTY OWNERS' LAND OR INTEREST 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 right of way for Sewer and Recycled water utility pipelines.

The Valley Center Municipal Water District (VCMWD) has verified that the Project has proposed pipeline routes for which no legal right of way currently exists for Sewer and Recycled Water. To use the Project's preferred Sewer and Recycled Water pipelines for this project, Eminent Domain taking of right of way is required. The Project's Alternate 4 pipeline route is claimed by the Applicant to have full legal right of way. However, as pointed out in Chapter 3 Public Comments, this claim requires substantiation in the three areas questioned.

The County has taken the position that Private Road right of way disputes are between individual private parties. That said, the County of San Diego has certain knowledge that offsite road improvements for the Project will require right of way for at least thirty separate takings of unwilling property owners' land or interest in road easements. The County has not been effectively transparent in providing Public information on required right of way for Offsite Improvements for assessment of Environmental Impact. Provide the following information:

**The County needs to disclose the following information so that impacts are identified and required Mitigation can be implemented.**

A). Required Disclosure of Relevant Information regarding legal rights for construction of Off Site Improvements as well as how the Applicant intends to gain legal rights

In the RDEIR, the County has not provided adequate disclosure regarding off-site impacts of the Project and its Alternatives to surrounding property owners.

This information is necessary to demonstrate Project Feasibility that the Project can ever be legally built.

For the Project and each of its Alternatives, provide the following information regarding off-site improvements for which Accretive Investments currently holds less than full legal right of way. For each impacted parcel, indicate what the Applicant has done to attempt to secure legal rights. Disclose how the Applicant or the County intends to secure the necessary legal rights for these parcels:

<u>Parcel Number</u>	<u>Property Owner</u>	<u>sq ft. Right of Way required</u>	<u>sq.ft.Slope Easement</u>	<u>Total sq. ft.</u>
<u>Encroachment</u>				

C1c-61  
cont.

C1c-62

C1c-63

C1c-62 and C1c-63

The commenter raises concerns about easements with respect to the project and project alternatives. Please refer to response to comment C1c-61 and the Global Response: Off-site Improvements - Environmental Analysis and Easement Summary Table.

**i) West Lilac Road**

Scenario 1 – Construction of West Lilac Road from Old Hwy 395 to proposed new Road 3b to 2.2 C Road Standards as is the General Plan Baseline. No information on offsite improvements has been provided by the County for the full route of this Alternative, which is the present General Plan Mobility Element baseline.

Scenario 2 a – As per "Right of Way Analysis W. Lilac Rd Alt 1 2.2C/2.2F dated Oct 31, 2013 **with additional land necessary to incorporate Reid Middleton Roundabout design modification recommendations identified.** The Oct 31, 2013 study found that 22 parcels were impacted for a total of 4.3 acres. The Study did not quantify the additional parcels impacted by Roundabout redesigns recommended by Reid Middleton. Please include a current and accurate disclosure of the parcels as impacted by Roundabout redesign.

Scenario 2 b – As per "Right of Way Analysis W. Lilac Rd Alt 1 2.2 C dated Oct 31, 2013 **with additional land necessary to incorporate Reid Middleton Roundabout design modification recommendations identified.** The Oct 31, 2013 study found that 22 parcels were impacted for a total of 5.6 acres. The Study did not quantify the additional parcels impacted by Roundabout redesigns recommended by Reid Middleton. Please include a current and accurate disclosure of the parcels as impacted by Roundabout redesign.

Scenario 3 – Impact of improvement from non-compliant 2.2F to 2.2E configuration to improve horizontal curves and provide bicycle lanes in each direction and 8 foot shoulders for West Lilac Road from Easterly boundary of Subdivision (currently near existing Lilac Walk private road intersection) to Covey Lane. This scenario is discussed further in section 2). Direct Impacts to West Lilac Road section of this letter.

**ii). Covey Lane/West Lilac Intersection**

Scenario 1 – Impact of construction to Applicant's proposed design **including Sight Distance Clearance and turn tapers. Please carefully analyze the need for Additional Slope Easements beyond those granted in IOD's.**

**iii). Mountain Ridge Private Road including Mountain Ridge/Circle R Intersection**

Scenario 1 – Impact of improvement to Applicant's proposed design **including Sight Distance Clearance and turn tapers.**

Scenario 2 – Impact of improvement of Mountain Ridge Private Road to 30 Mph Private Road Design Speed Standards **including Sight Distance Clearance and turn tapers.**

Scenario 3 – Impact of construction of Mountain Ridge Private Road to Public Road Design Standards **including Sight Distance Clearance and turn tapers.**

C1c-64

C1c-65

C1c-66

C1c-64 Scenario 1—Proposed improvements to West Lilac Road are discussed in their entirety in Chapter 1.0 of the FEIR. Specifically, the project proposes improvements to West Lilac Road from Old Highway 395 to Road 3. Impacts associated with these improvements have been considered throughout the appropriate subchapter of the FEIR, and are included in the cumulative impacts section of each subject as well. Please also see response to comment I51b-5. Chapter 4.0 of the FEIR, subchapter 4.8.1.2, analyzes the Road Design Alternative 2: West Lilac Road Over I-15 Bridge. This alternative analyzes the construction of West Lilac Road over the I-15 bridge as a County Light Collector road 2.2C, without any design exceptions. Improvements to 2.2C standards without exceptions would require a wider bridge. However, as widening the bridge is not likely feasible due to engineering constraints, a second bridge would need to be constructed to meet the 2.2C standards. This alternative analysis recognizes that construction of a second bridge would likely be infeasible due to cost. The analysis also shows that improving the bridge to 2.2C standards, without exceptions, would result in additional impacts with either the widening option or the second bridge option.

Scenario 2a—The commenter accurately represents that a redesign of the roundabouts resulted from the Reid Middleton Roundabout Study. The revised design is reflected in the current project description. All impacts are located within the original footprint of the roundabout. The roundabout redesign would impact off-site areas; however, those areas are within existing Irrevocable Offers of Dedication (IODs) with both slope and drainage rights. No new impacts would occur based on the roundabout redesign. The FEIR adequately analyzes the potential environmental impacts associated with construction of the off-site physical improvements as required under CEQA. With respect to related property rights, please see Global Responses: Easements (Mountain Ridge Road and Covey Lane) and Off-site Improvements - Environmental Analysis and Easement Summary Table which describes the respective off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties.

Scenario 2b and 3—The commenter is referencing a second alignment study associated with the Reid Middleton Roundabout Study. This design was not selected to be included in the project and is not relevant for inclusion in the project's CEQA analysis.

LETTER

RESPONSE

	<p>C1c-65 As discussed below, the scope of the slope rights included in the referenced IODs is sufficient to encompass all necessary grading and earthwork and, therefore, no additional slope rights beyond those granted are necessary for road construction. As to sight distance clearance, as shown in the Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary Table, a clear space easement on APN 129-190-44 is necessary in order to remedy the existing deficient condition at the intersection.</p> <p>Attachment 1 to the Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary Table, is a memorandum prepared by engineers Landmark Consulting that addresses access rights on both Mountain Ridge Road and Covey Lane (Landmark Memorandum). The Landmark Memorandum determined that for both roads, there are existing road easements or Irrevocable Offers to Dedicate (IODs) Real Property that provide the necessary rights to improve these roads to accommodate the proposed project and no additional easements are required for road construction.</p> <p>Landmark Memorandum Exhibit I, IOD for parcel no. 80-0494-A1, states that the rights offered include “the privilege and right to extend drainage structures and excavation and embankment slopes beyond the limits of the herein described right-of-way where required for the construction and maintenance of said County highway.” (Ex. I, p. 839.) Landmark Memorandum Exhibit J, parcel map no. 18536, further states “we hereby dedicate to the public that portion of Covey Lane for use as a street as shown on said map together with the right to extend and maintain drainage facilities, excavation and embankment slopes beyond the limits of said right-of-way.” (Ex. J, Sheet 1 of 4.) Thus, the IODs convey grading and drainage rights beyond the limits of the right-of-way.</p> <p>Landmark Memorandum Exhibit H, Covey Lane Off-Site Access, illustrates the grading limits necessary to construct the public road; the grading limits are the furthest the slopes would extend on each side of the future public road. As shown, the grading limits do not extend beyond the available right-of-way, except adjacent to the right-of-way described in the IOD dedicated with Parcel Map No. 18536 and, as described above, this IOD includes slope rights that permit slopes beyond the limits of the right-of-way.</p>
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LETTER

RESPONSE

	<p>C1c-65 (cont.)</p> <p>Thus, the slope rights associated with the IODs, as described above, along with the future dedication of right-of-way, as permitted with the private road easement that benefits Lilac Hills Ranch (see Landmark Memorandum Exhibit K), provide all of the rights necessary to construct the public road portion of Covey Lane to the project boundary, including the slopes necessary to support said public road. As to sight distance clearance, as noted above and as shown in the Global Response, Off-Site Improvements – Environmental Analysis and Easement Summary Table, a clear space easement on APN 129-190-44 is necessary in order to remedy the existing deficient condition at the intersection.</p> <p>Please also refer to Global Response: Easements (Covey Lane and Mountain Ridge Roads) for a thorough discussion on related topic.</p> <p>C1c-66</p> <p>Scenario 1. Please refer to Global Response: Easements (Covey Lane and Mountain Ridge Roads) for a thorough discussion on related topic.</p> <p>Scenario 2. The impacts are evaluated in the Alternatives Chapter of the FEIR. See subchapter 4.8 for details.</p> <p>Scenario 3. The impacts of the proposed alternatives (including construction of Mountain Ridge Road to Public Road Standards) are evaluated in the Alternatives Chapter of the FEIR. See subchapter 4.9 for details.</p>
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LETTER

RESPONSE

iv). **Rodriguez private road.** Please further enumerate the all improvements proposed for Rodriguez Road as represented in Master Preliminary Grading Plan TM 5571 RPL 4 Sheet 7 of 12. Provide the legal basis of rights to construct the improvements to Rodriguez Road. Provide a copy for Public Review of document 2013-0021800 Rec. 1-11-2013.

C1c-67

**Property Rights ARE an RDEIR Issue. Without the acquisition of land for offsite improvements, this Project IS INFEASIBLE.**

C1c-68

Executive Summary Comment RDEIR Paragraph S.3 Areas of Controversy page S-4 – Item 2 – Infeasibility of the Project's undefined and infeasible Phasing Sequence Phasing – The Applicant seeks the utmost in flexibility in developing the Project in Phases of which there are many possible permutations, and no assurance whatsoever of Project performance of Conditions of Development.

C1c-69

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 EIR that some Phases may never be built. Mitigations for Traffic Impacts are tied to events that may never happen. This is a serious defect with the EIR. There is no assurance that promised Mitigation will ever occur.

Refer to the following Table 1 – 4 from Chapter 1 EIR Objectives page 1- 34.

**TABLE 1-24  
GRADING QUANTITIES BY PHASE (cy)**

Phase	Cut	Fill	Net
1	715,000	860,000	(145,000)
2	635,000	830,000	(195,000)
3	1,815,000	1,260,000	555,000
4	295,000	420,000	(125,000)
5	610,000	700,000	(90,000)
<b>TOTAL</b>	<b>4,070,000</b>	<b>4,070,000</b>	<b>-</b>

C1c-70

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 is the 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. Please identify how the Project intends to implement Phase 1 without grading on Phase 3. Also, will

C1c-67 Rodriguez Road is an existing 40-foot-wide private easement road that would require surface improvements necessary to accommodate the secondary emergency access requirement for the Phases 4 and 5. Specifically, Rodriguez Road would be improved from its current state to a 28 foot graded/ 24 foot paved roadway. For details on the easement rights held by the project to construct required improvements refer to the Global Response: Off-site Improvements - Environmental Analysis and Easement Summary Table.

C1c-68 The need for easements and use of eminent domain is not an environmental issue under CEQA as obtaining easements would not result a physical change in the environment. The FEIR adequately discloses all physical environmental impacts that would result from off-site improvements, including those that may require the use of eminent domain. In addition, the applicant has the required easements needed to construct required improvements. Also, refer to the Global Response: Off-site Improvements - Environmental Analysis and Easement Summary Table.

C1c-69 The project is designed so that each phase of construction would trigger specific mitigation measures. They County does have assurance that the project mitigation measures would be implemented as each phase is developed because required mitigation measures and improvements needed to support the development would become conditions of approval of each implementing tentative map. The mitigation measures for traffic in particular are tied to the number of Equivalent Dwelling Units (EDU) that are constructed to ensure that all transportation mitigation measures are implemented prior to the impact occurring (e.g. prior to approval of EDU that would add traffic to roadways, resulting in a significant impact).

C1c-70 The commenter raises concerns about the flexibility of project phasing and project grading in conjunction with project implementation. The Phasing Plan included in Part IV of the Specific Plan describes project grading. The Specific Plan indicates that both cuts and fills are proposed within each grading area and fill material would be transferred between the areas as required. Future grading plans would identify the location of gradig, which could require grading in more than one phase to obtain required fill material. However, as stated in the Specific Plan, no more than 50 acres would be graded at the same time.

LETTER

RESPONSE

Phase 3 be used as a quarry for fill dirt for an extended period?

The County of San Diego has not adequately addressed this fundamental discontinuity. The net result of this is a Significant Impact of Project Feasibility.

This example of infeasibility or vastly different Environmental Impacts is repeated over and over again with every Infrastructure aspect: Roads, Sewers, Waste Water, etc.

The timing of implementation of Mitigation should be defined with much more rigor than the County has employed. Road Improvement from Significant Impacts are 'triggered' by attainment of a threshold number of Residential Units. The County of San Diego should recognize that certain Commercial Land Uses are far greater drivers of Traffic Impacts than Residential.

Another related defect of this "Phase Game" 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 this EIR.

Left with the unbounded Phasing strategy the Applicant proposes, the Project as implemented will have vastly different Environmental Impacts than those analyzed in this EIR.

**The Project needs to be required to adopt a defined Phasing Plan sequence with only a few allowable Phase Alternates in order that the proper Environmental Impacts can be assessed.**

**Wastewater Treatment Options**

The Project claims that it will have wastewater 'transferred' from a collection point on-site to the Lower Moosa Canyon Wastewater Reclamation Facility [LMWRF] for up to 1250 equivalent dwelling units [EDU], or over 70% of the total EDU in the Project. This makes one wonder how long the 'transfer' will be going on. In the Temporary Treatment (for on-site treatment scenarios) segment of Chapter 1 of the RDEIR the 'transfer' is said to be by truck. In Chapter 1, Wastewater Service and Infrastructure, the 'transfer' mechanism is more nebulous, saying that the wastewater would be pumped into a forced main and routed south to the LMWRF. How the waste gets to the treatment facility is important for the estimation of truck traffic to and from the Project. It is also important to estimate how long the transfer process will go on before a final solution, or treatment, is chosen. How has the County estimated the truck traffic that will be hauling as much as 250,000 gallons of wastewater a day [that's over 70% of the Project total], from the Project to the LMWRF? Will this have a significant impact on congestion on the roads serving the Project? What will be the duration of the transfer by truck? Will the applicant be performance bonded for building one of the four optional forms of wastewater disposal proposed to ensure that the Project is served?

C1c-70  
cont.

C1c-71

C1c-72

C1c-73

C1c-74

C1c-70 (cont.)

Project grading is also discussed in Chapter 1.0 of the FEIR. With respect to the net import or export of fill, project construction would be a balanced cut/fill operation as shown in FEIR Table 1-4. Throughout the phasing of the construction, however, there are some areas with a net cut and other areas with a net import. The project will be using those sites with net cut for borrow sites. Phase 3 land will be used as a borrow pit, not a quarry, and the project will be required to comply with all applicable government regulations and requirements, including provisions of the County Grading Ordinance found in Section 87.101 et seq. of the San Diego County Code.

C1c-71

The commenter expresses general concern about the environmental impacts from the construction of the project. This is a conclusory statement and the issues of concern are addressed in more specificity in the preceding and following responses. Potential impacts from the construction of project grading and construction is fully analyzed throughout FEIR. The project would provide all infrastructure needed to serve the project and no issues of infeasibility have been identified.

C1c-72 and C1c-73

The phasing plan discussed in FEIR subchapter 1.2.1.10, as well as Section 5 of the Traffic Impact Study (Appendix E), describe the traffic trips for both the equivalent residential dwelling units and the commercial uses, if any, in each phase of the project. Pursuant to Section 5 of the Traffic Impact Study (Appendix E) and subchapter 2.3.5 of the FEIR, the phased traffic mitigation measures therefore relate both to residential and commercial traffic trips generated in each phase. Further, the commercial uses for the project generate only 33 percent of peak hour traffic trips at project build-out. As a result, the recommended mitigation measures are appropriately tied to the approval of a specified number of residential dwelling units associated with final maps because the commercial uses within each Final Map have been translated into equivalent residential dwelling units. Therefore, the timing appropriately considers both residential and commercial uses.

LETTER

RESPONSE

	<p>C1c-72 and C1c-73 (cont.)</p> <p>The commenter is concerned about the lack of fixed project phasing and potential traffic impacts that could occur due to the phasing flexibility. However, as described above since the traffic mitigation measures are tied to traffic trip generation that consists of both residential and commercial traffic trips, regardless of the phase the mitigation measures would be applied based upon the traffic trips that are generated by that phase. Thus no new impacts would occur due to the order of phasing that is ultimately implemented.</p> <p>C1c-74</p> <p>The comment references the project description sentence, “Therefore, the pump stations and on-site collection system would be set up that so that wastewater could either be transferred to the Lower Moosa WRF or transferred to the on-site location.”. In this sentence the word “transferred” is referring to the on-site wastewater collection system, e.g. the pipes and infrastructure needed to transport wastewater.</p> <p>Regarding the trucking of wastewater, as stated in the Project Description (Chapter 1.0), if one of the on-site wastewater treatment scenarios is selected, the project would require temporary trucking of sewage during the initial phases of the project. For an on-site permanent WRF, trucking would be required for up to the first 100 homes (approximately three truck trips per day) to allow for a sufficient minimum flow to operate the facility. For a smaller on-site interim WRF, trucking would be required until as few as 25 homes are occupied. In either case, as soon as sufficient flows are available, trucking operations would cease. As specified in section 11.1 of the Traffic Impact Study included as Appendix E to the FEIR, “the project is expected to generate 6 truck trips (equivalent to 15 vehicle trips) per day from waste water transport activities between the project site to the Moosa Water Reclamation Facility located along Circle R Drive, just east of Old Highway 395. Note that this waste water transport activity only happens for the first 100 units, after which a temporary line from the project site down to the Moosa facility will be construed via Mountain Ridge Road to Circle R Drive.” The FEIR adequately addresses the impacts of truck trips from hauling wastewater. It should be noted that the commenter overestimates the amount of wastewater that would be required to be trucked. Trucking of the first 100 homes is equivalent to approximately 20,000 gallons per day.</p>
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LETTER

RESPONSE

<p><b>Phasing Plan</b></p> <p>Although the planned phases of the Project are numbered, the County allows that the applicant will build phases or portions of phases as market conditions permit. It is suggested that phases 4 and 5 may be built independently of the other phases. So, rather than an orderly development, it could be somewhat chaotic, as grading is taking place in one phase to accommodate the fill needs of another and some phases are moving forward without regard to the other phases. It seems as if it could take much less than 10 years under some scenarios, or in others some phases may not be built at all unless the real estate market behaves. How can a rational person call this a phasing plan? There is very little that is phase-like in it. It reads more like a free-for-all.</p> <p><b>1.4.2 Planning Context</b></p> <p>There are comments on the General Plan and Community Plans consistency elsewhere in these comments, but it must be noted that citing Circle R Ranch as similar to the proposed Project is specious. The Circle R Ranch development is a clustered development that is going on 40 years old. The smaller lots of that development were made possible by the considerable open space of the golf course. There is no analogous open space in Accretive's Project. And lest the County attempts to cite Welk Resort, another older development put in place before there were rational regulations on density and leapfrog development, it too is a clustered development with smaller lot sizes compensated by considerable open spaces.</p> <p>The two, nearly contiguous villages of Valley Center are defined as the village core of the planning area and are recognized as the center referred to in the Community Development Model.</p> <p><b>1.6 Project Inconsistencies With Applicable Regional and General Plans</b></p> <p><b>GENERAL PLAN INCONSISTENCY</b></p> <p><b>I. Introduction:</b></p> <p>In comments submitted over the last several years about Accretive Investment Group's Specific Plan/General Plan Amendment (SP/GPA), the Valley Center Planning Group and the Valley Center Design Review Board have repeatedly challenged the proponent's assertions that this proposal is consistent with the adopted County General Plan [GP], or with Valley Center's Community Plan [CP], or with Valley Center Design Guidelines.</p> <p>Our previous comments, which are attached, have also challenged the Orwellian logic exhibited throughout the SP/GPA text, and the original Draft Environmental Impact Report (DEIR 2013) and now in the REVISED DEIR (RDEIR 2014). We stand in robust opposition to the claims in these documents that a change of Regional Category -- from</p>	<p>C1c-75 The commenter is concerned about the lack of fixed project phasing. See response to comments C1c-69 through C1c-73.</p> <p>C1c-76 The comment expresses the opinions about the surrounding developments, but does not raise a specific issue with the content of the FEIR. For details on project compliance with the General Plan, refer to Appendix W of the FEIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.</p> <p>C1c-77 The County acknowledges your comment and opposition to the project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p> <p>The proposed project would require a General Plan land use map amendment from Semi-Rural to Village, and would modify the land use designations in the Valley Center Community Plan and the Bonsall Community Plan. Upon certification of a GPA, the project would be consistent with the General Plan the Regional Categories Map and Land Use Maps. The General Plan states that it is intended to be a dynamic document and that amendments will be reviewed to ensure that the change is in the public interest and would not be detrimental to public, health, safety, and welfare. (General Plan, page 1-15) Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W for a thorough discussion on related topic.</p>
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Chapter 1: Project Description, Location, and Environmental Setting 21

Semi Rural to Village -- magically reconciles the project's gaping inconsistencies with the intent of the Community Development Model and with the wide array of interdependent General and Community Plan Goals and Policies that are meant to implement it.

Despite thousands of pages of "public comment" nothing has changed; neither the project parameters nor the perverse and circular arguments that, in the name of San Diego County, advance it. The proposed SP/GPA remains inconsistent -- broadly and fundamentally -- with the San Diego County General Plan and the Community Plans of both Valley Center and Bonsall.

**II. RDEIR 2014 dodges rather than examines inconsistencies:**

RDEIR 2014 persists in avoiding the truth of these inconsistencies and thus fails to provide analyses required for decision makers to understand the nature and reach of its impacts. Therefore, RDEIR 2014 is derelict in concluding as it does that: *"Overall the project would be consistent with the General Plan; therefore land use impacts associated with policy inconsistencies would be less than significant"* (Chapter 3 Environmental Effects Found Not To Be Significant.).

We all can understand why the applicants might want to avoid disclosing the system of GP and CP Goals and Policies that this project violates. But San Diego County's mandate in its performance of CEQA's purpose is not to deny inconsistencies in order to avoid analysis and ease approval of this project. CEQA's purpose is disclosure. The RDEIR for this SP/GPA must honestly reckon with the issue of General and Community Plan consistency. This includes the General Plan Vision and Guiding Principles, the reflection of these in the Community Development Model, and in the Goals and Policies that are meant to implement these ideas across the GP's and CP's seven elements: Land Use, Mobility, Conservation and Open Space, Housing, Safety and Noise.

**III. The California Environmental Quality Act (CEQA) requires a General Plan consistency analysis and supportable conclusions. The conclusion of RDEIR 2014 that planning impacts are "insignificant" is not supported by the evidence.**

The RDEIR disguises with double talk the extent to which this SP/GPA is inconsistent with the County's planning documents. Planning impacts are far from "insignificant". They are broad and fundamental. Approving this SP/GPA requires rejecting the GP's foundational vision of Smart Growth and eliminating the many GP Policies that support it. Introductory remarks in the RDEIR state this fact.

The double-talk of this RDEIR is demonstrated in the mighty leap it takes from the truthful declaration (that this proposal is inconsistent with the existing General Plan) to the also truthful declaration (that the proposal *will be* consistent with the amended General Plan) -- without bothering to analyze the inconsistencies of the first condition. But analysis of the first condition is the entire point of an Environmental Impact Report.

C1c-77  
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C1c-78

C1c-79

C1c-78 See the Global Response: General Plan Amendment CEQA Impacts Analysis and Appendix W.

C1c-79 This comment mischaracterizes the analysis framework of the FEIR and statements found in the FEIR. The proposed project would require a General Plan land use map amendment from Semi-Rural to Village, and would modify the land use designations in the Valley Center Community Plan and the Bonsall Community Plan. This General Plan Amendment to the Land Use Map is an element of the project. The FEIR frames the General Plan consistency analysis in subchapter 1.4 under "Environmental Setting," and describes its current land use planning context (current general plan land uses and both community plans). (FEIR, subchapter 1.4.) Subchapter 1.6 describes the General Plan amendment required for approval of the project and that is analyzed by the FEIR. Each chapter of the FEIR contains a discussion of the project's consistency with the existing General Plan and whether any physical environmental impacts would occur as a result of implementing the proposed project. The land use consistency analysis for the project as proposed is presented in the FEIR Chapter 3.1.4 and in Appendix W. The FEIR concludes that land use impacts would be less than significant because the project would be consistent with the General Plan upon approval of the GPA. The FEIR clearly and thoroughly presents analysis of the potential physical environmental impacts that would result from project approval and the amendment of the Regional Land Use Element Map to change the regional land use category from Semi-Rural to Village. The project also includes a GPA to the Mobility Element to downgrade the segment of West Lilac Road from Running Creek Road to Main Street from a 2.2C to a 2.2F road, which is addressed in section 1.6 of the FEIR (See also Section 2.3/Traffic with respect to West Lilac Road and Road 3). An amendment to Table M-4 would also be required because the reduction of West Lilac Road from a 2.2C to a 2.2F would result in West Lilac Road operating below acceptable levels of service.

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<p>CEQA directs the County to answer the question: in what ways does this project change current conditions? How can planning professionals confuse the difference between pre-project and post-project conditions in the first place? And how can this "mistake" be repeated and elaborated in the revision despite hundreds of public comments that point this out?</p> <p>There is no evidence that the intention of the existing San Diego General Plan is to drop "new villages" into semi-rural and rural areas of unincorporated communities where the Community Development Model has been applied and boundaries of Regional Categories have been determined. To the contrary, the County General Plan is grounded in its "Smart Growth" intention. Smart Growth is a two-sided concept. On the one hand Smart Growth locates future development in areas where infrastructure is established; AND on the other hand, Smart Growth also retains or enhances the County's rural character, economy, environmental resources, and unique communities. These are integrated, co-dependent concepts. They work together.</p> <p>The proposal to plop 1746 homes and 5000 people into several thousand acres of infrastructure-lacking Semi-Rural and Rural land contradicts the County's overall commitment to "sustainable development" as well as the Principles, Goals, Policies and implementation mechanisms of the adopted General Plan that support sustainable development. This foundational concept is described at length in the introduction to the County General Plan and is expressed across the web of interdependent GP Guiding Principles, Goals and Policies that have been put in place to implement the County's Smart Growth Vision. These points are stated clearly in the existing General Plan text. To attempt to override this adopted Vision now should require a severely amended County General Plan and a new Countywide EIR to approve it.</p> <p><b>IV. Paramount among the project's GP inconsistencies is its failure to comply with Land Use Goal 1 (LU-1) and Policy LU1-2</b></p> <p>Consistency with Land Use Goal 1 (LU-1) and with Policy 1.2 (LU 1.2) is especially crucial for this project's approval. These speak directly to the requirements for establishing NEW villages in San Diego County. They emphasize the primacy of the Land Use Element and the Community Development Model, and the prohibition of Leapfrog Development.</p> <p><i><b>Land Use Goal 1: Primacy of the Land Use Element.</b> A land use plan and development doctrine that sustain the intent and integrity of the Community Development Model and the boundaries between Regional Categories.</i></p> <p><i><b>Land Use Policy 1.2: Leapfrog Development.</b> Prohibit leapfrog development which is inconsistent with the <u>Community Development Model</u>. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the <u>LEED Neighborhood Development Certification</u> (LEED ND) or an equivalent. For purposes of this</i></p>	<p>C1c-80 The commenter incorrectly asserts that growth can only occur in the existing Village areas designated in the General Plan. This interpretation would prohibit the County from amending its General Plan in the future to allow for the establishment of any new villages. General Plan Policy LU-1.2 permits new villages that are consistent with the Community Development Model and meet the requirements set forth therein. Language in the General Plan clearly allows for future amendments to the Land Use Map and Regional Categories Map.</p> <p>The General Plan identifies those goals and policies that contribute to achieving sustainability on Table I-1. The FEIR analyzes whether the project meets all of the relevant policies listed in Table I-1, including the sustainable development principles of LU-1.2 and the Community Development Model, as described throughout each of the appropriate subchapters of the FEIR and in Appendix-W to the FEIR. Please also refer to Global Response: Project Consistency with General Plan Policy LU-1.2.</p> <p>C1c-81 The commenter questions project consistency with the General Plan Policy LU-1.2. The commenter asserts that the existing Village areas designated in the Community plans for Bonsall and Valley Center are in fact village cores within a Community Development Model. Regardless as to whether this is true, it does not prevent the designation of new villages that meet the criteria of LU-1.2. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic.</p> <p>There are numerous policies in the General Plan that contemplate that future growth will occur and provide direction with respect to its future planning, such as M-2.1 (require development projects to provide road improvements), M-3.1 (require development to dedicate right-of-way), S-3.1 (require development to be located to provide adequate defensibility), and COS-2.2 (requiring development to be sited in least biologically sensitive areas). Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W.</p>
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*policy, leapfrog development is defined as Village densities located away from established villages or outside established water and sewer service boundaries. (See applicable community plan for possible relevant policies.)*

The RDEIR for this SP/GPA asserts that the project is consistent with GP Policy LU 1.2. But, evidence does not support this assertion. The evidence leads to the conclusion that the SP/GPA fails in the most fundamental ways to respect the County's commitment to sustainable development.

Below we show that this project does not meet exemption criteria.

**A. Criteria 1: The Accretive SP/GPA is INCONSISTENT with assigned Regional Categories and the adopted application of the Community Development Model**

RDEIR 2014 would have us believe that the GP Community Development Model is nothing more than an abstract diagram and that Village "puzzle pieces" can be dropped into Semi-Rural and Rural backgrounds with no significant effect and can also be pronounced consistent with the existing General and Community Plans for this area.

The subject of this EIR are 608 acres in TWO existing Community Planning Areas where the Community Development Model has been applied through a lengthy and expensive public process to create a long-range plan for the development of this area which is an integral part of the long-range plan for San Diego County. RDEIR 2014 claims that re-categorizing this site eliminates the need to analyze any planning impacts. This notion denies that adopted Regional Categories and plans for the communities of Valley Center and Bonsall have any effect on these communities, or on the larger plan for San Diego County. In effect, RDEIR 2014 denies the existing planning condition that it is supposed to analyze against this proposal to amend it.

A new "Village" plopped into these existing communities is by definition INCONSISTENT with the current condition because consistency can be achieved *only* by amending the adopted General and Community Plans to fit the project. Regardless of this RDEIR's strained and fallacious logic, common sense knows that there is a very significant difference between fewer than 200 homes and nearly 1800 homes (not to mention everything else that this project includes) on the same 608 acres. Changing the Regional Category that has been assigned to these 608 acres from Semi-Rural to Village creates tremendous impacts on these acres, and on the two thousand of acres that surround them. Nonsensical justifications of this RDEIR cannot magically eliminate them. Rather than denying these impacts, it is incumbent on this RDEIR to identify and analyze them.

In addition, the Community Development Model is more than a diagram in other ways, as well. On the one hand, it reflects the array of General Plan principles, and on the other, it is meant to be implemented by the Land Use Goals and Policies to which the GP text refers. Therefore, consistency with the Community Development Model should be demonstrated -- not by unsubstantiated assertion as it is in this RDEIR -- but

C1c-81  
cont.

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<p>rather by showing that the SPA/GPA is consistent with the Community Development Model BECAUSE it is consistent with the Goals and Policies that implement the Community Development Model. Obviously, the Accretive SPA/GPA is consistent with none of these.</p> <p>Again, double talk serves to confuse pre- and post-conditions and contaminates "analysis" with fallacious presumptions and circular logic. First, RDEIR 2014 asserts without a shred of evidence that the new condition is consistent with the Community Development Model. Second, RDEIR 2014 leaps from this assertion to the next assertion that the consistency with all the Goals and Policies is inferred by consistency with the Model. Round and round we go. Orwell would be impressed.</p> <p>Changing a particular place from one Regional Category to another, therefore, requires amending the network of planning concepts that the original category is expressing, for example:</p> <ol style="list-style-type: none"> <li>1. The General Plan states (pp.3-7), "<i>Village areas function as the center of community planning areas and contain the highest population and development densities. Village areas are typically served by both water and wastewater systems. Ideally, a Village would reflect a development pattern that is characterized as compact, higher density development that is located within walking distance of commercial services, employment centers, civic uses, and transit.</i>"</li> <li>2. The proposed site is designated not for Village development but for large semi-rural parcels (SR 10 and SR-4). This SP/GPA proposes to plop a Village into the middle of an area that the existing GP and the existing implementation of the Community Development Model designates for Semi-Rural and Rural development. This action requires AMENDING how the Community Development Model has been implemented in this area. Instead, with no discussion or analysis, the SP/GPA and the RDEIR all assert that consistency with the Community Development model is achieved with a simple change on the Land Use map.</li> <li>3. Further, the site abuts SR-4, SR-10 and Rural-40 acreage. The project provides no buffer between its urban density and rural properties owned by others. The Community Development Model <b>requires</b> a "feathering" of residential densities from intense Village development to SR-0.5, SR-1, SR-2, SR-4, and so forth. The Accretive SP/GPA is inconsistent with the concept of feathering which is reflected properly in the pattern of land use designations in Valley Center's central valley.</li> <li>4. This SP/GPA is located many miles from areas that the Community Development Model designates for Village development: miles from employment centers, shopping, entertainment, medical services, and civic organizations and activities.</li> <li>5. As for infrastructure, there are few existing roads in the area. They are built and planned to service Semi-Rural and Rural development, as in the current General and Community Plans. Despite proposing intense Village development, the proponents also propose to retain or reduce capacities of these roads. Water</li> </ol>	<p>C1c-82 Please refer to response to comment C1c-81.</p> <p>C1c-83 The project is designed to be consistent with the Community Development Model by proposing a new Village Regional Category that is surrounded by Semi-Rural Regional Category lands, which transitions to Rural Regional Category areas. The project has been designed with the highest intensities (commercial, mixed-use and attached residential) within the central portion of the project (Town Center) and the lower-intensity residential uses around the perimeter of the site (single-family detached residential uses.) The Town Center includes high-density residential development, commercial and professional offices uses, various private and public facilities, multiple private parks, and community trails. Compact residential neighborhoods surround the Town Center towards the project perimeter and support several small parks and community trails. Neighborhood centers include clusters of attached homes, commercial and professional uses, a 13.5-acre public park and community trails. The project perimeter transitions to surrounding semi-rural areas by featuring: wider, ranchette-style lots, a 50-foot wide orchard-planted buffer, and a 104-acre natural open space preserve. The road network is densest at the Town Center and there are over sixteen miles of landscaped, lighted, and signed multi-use community trails providing a pedestrian lineage to every part of the community, which also connects to the County regional trail system. (See Specific Plan, Part V.B., pp. v-7 to v-9) (FEIR, Subchapter 3.1.4.2, Land Use Planning, p. 3-87-89; Technical Appendix W, Att. A, pp. 1-2; Specific Plan, Part II.G., pp. II-38-40.)</p> <p>C1c-84 The comment is based on a mistaken premise that the Community Development Model itself designates land use in a particular location. To assert, as commenter does elsewhere, that the Community Development Model can only be applied to those villages that have been established by the current General Plan would prohibit the County from amending its General Plan in the future to allow for the establishment of any new villages. Please refer to response to comment C1c-81 for further discussion of this topic.</p>
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infrastructure serves 50 homes and agricultural irrigation. There is no wastewater service.

- 6. The intent of the Community Development Model is to intensify development in **existing** Villages -- not to create NEW Villages through the destruction of Semi-Rural and Rural lands. The Community Development Model was applied in Valley Center during the General Plan update process. Village boundaries were drawn. Village densities were planned to feather from the commercial and mixed use core to meet the Semi-Rural designations. Twenty-five percent (25%) of the community's future development is now planned for the "Village" area in the center of the Valley Center Planning Area, at the community's traditional "crossroads" where road, water and wastewater infrastructure, as well as schools, churches, shops and businesses are **already** in place.
- 7. A key component of applying the Community Development Model to the land use map in the General Plan was to show graphically the locations for future growth. The RDEIR ignores that the existing General Plan identifies existing planned villages as the hubs for growth, and that these areas are planned for intensification over the life of this new General Plan. Nowhere in the SP/GPA or in the RDEIR is there any justification for this extra Village and its plethora of significant impacts on lands that ARE planned for sparse residential development and conservation of agriculture. Again, there is no evidence for the conclusion that this project is necessary for achieving any public objective.

C1c-85 cont.

C1c-86

C1c-87

**B. Criteria 2: The Accretive SP/GPA is Inconsistent with LEED Neighborhood Development Certification standards.**

Compliance with LEED Neighborhood Development Certification standards is a critical requirement for this project. Without analyses required by CEQA, the RDEIR ASSERTS compliance with LEED-Neighborhood Development requirements, perhaps because analysis reveals that the Accretive SP/GPA so woefully fails to meet them.

But, unsubstantiated assertion fails to satisfy CEQA. The County must comprehensively address the numerous and exacting requirements of LEED Neighborhood Development Certification. If the County is applying not LEED ND but an "equivalent standard" as policy LU1-2 allows, the analysis should name the standard and show how it is equivalent.

To date we believe there is no recognized equivalent to LEED ND. If there were a recognized equivalent it would be, well, equivalent. Despite the insistence of a few PDS staffers who will remain nameless that "there might somewhere be an equivalent standard that does NOT require a "Smart" location -- in the English language the word "equivalent" does mean "equal." Any standard that omits the pre-requisite requirement for selecting a location would, of course, NOT be equivalent.

At the end of this document we have included key excerpts from the booklet, **LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT**. However, we encourage thoughtful readers to review the entire 70-page booklet where these exacting standards

C1c-88

C1c-85 With respect to adequate water and sewer, please see response to comments C1c-96 and 97. With respect to adequate roads, please see response to comments c1c-3, c1c-10, and c1c-18. See also Global Response: Project Consistency with General Plan Policy LU-1 and Appendix W.

C1c-86 Please refer to response to comment C1c-14 and Global Response: Project Consistency with General Plan Policy LU-1.2 and C1c-81 above.

C1c-87 Refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W and C1c-81 above.

C1c-88 to C1c-98 Comments C1c-88 through C1c-98 questions project consistency with General Plan Land Use Policy LU-1.2, specifically with the LEED-ND equivalency policy criteria. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic. See also below for specific responses to areas not covered by such responses.

are discussed and illustrated in intricate detail. The booklet is published by the U.S. Green Building Council and is available on their website.

C1c-88  
cont.

As the booklet makes clear: For LEED ND Certification a few location, conservation and design criteria are mandatory. This means that, regardless of how many "points" are accumulated for "green" amenities, LEED ND Certification cannot be achieved without meeting a few essential standards in particular categories.

We still await the County's analysis of the full complement of standards for LEED ND Certification. GP LU1-2 is clear in its intention that the Accretive SP/GPA must comply with all standards that are required for LEED-Neighborhood Development Certification. However, in order to provide the reader with a sense of how comprehensive and detailed the LEED ND standards are, we have included below a list of the mandatory requirements for the two areas where our comments are focused this time -- Smart Location and Neighborhood Pattern and Design. We will address some of these in our comments below.

(More detail is available below in the attachment, *SELECTED BRIEF EXCERPTS FROM LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT* or from the original 70-page document on the U.S. Green Building Council website.)

C1c-89

**SMART LOCATION and LINKAGE**

These are PRE-REQUISITE criteria. Compliance is mandatory.

- Prerequisite 1 Smart Location
- Prerequisite 2 Imperiled Species and Ecological Communities
- Prerequisite 3 Wetland and Water Body Conservation
- Prerequisite 4 Agricultural Land Conservation
- Prerequisite 5 Floodplain Avoidance

**NEIGHBORHOOD PATTERN AND DESIGN**

These are PRE-REQUISITE criteria. Compliance is mandatory.

- Prerequisite 1 Walkable Streets
- Prerequisite 2 Compact Development
- Prerequisite 3 Connected and Open Community

**From our review of the LEED ND requirements we conclude that Accretive's SP/GPA fails to meet fundamental requirements for LEED ND Certification for the following reasons:**

C1c-90

- 1) **The site is not a "Smart Location."** The EIR concludes that the project is consistent with LEED-ND but completely overlooks its mandatory site selection requirements. However, the EIR does not address how this aspect of LEED-ND can simply be overlooked when the program was specifically designed to "place emphasis" on site selection. A fundamental premise of Smart Growth is to lower automobile dependency as compared to average Development. The SANDAG average miles/trip for all of San Diego County is 5.8 miles/trip. The SANDAG

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average miles/trip for the unincorporated San Diego County is about 13 miles/trip which is why the region is directing growth to the incorporated cities and existing villages. Accretive is proposing an automobile based urban sprawl community that even with exceedingly high and unsubstantiated internal trip rates is 47% higher than the San Diego County average ( 8.52/5.8) trip distance.

C1c-90  
cont.

2) **The site is too large (exceeds the 320-acre maximum size).** This maximum area is based on critical factors such as providing the appropriate density of services and neighborhoods within a compact community and achieving walkability. The EIR fails to address how the project is still in compliance with the LEED-ND program when it exceeds a standard that was determined by the "core committee's research."

C1c-91

3) **The proposed SP/GPA fails to meet LEED ND standards for a "walkable" neighborhood:** This issue brings to light another more fundamental one with much of the EIR's documentation. Throughout the document there is the assertion or suggestion that the proposed project will be "walkable". However, the only evidence that is provided are three circles on a map to suggest that someone could walk to someplace within that circle if they wanted to. This is not the definition of a walkable community. The LEED-ND standards were developed through the research of a core committee which suggests that a walkable neighborhood is no more than 320 acres and all services, civic uses, employment, and high density housing are contained within that 320 acres. Describing the proposed project as walkable is unsubstantiated and misleading. Further it has likely undermined technical analyses that rely on the premise that the project is walkable and take credit for that. These include the traffic, air quality, and greenhouse gas emissions analyses.

C1c-92

4) **It is neither an infill site nor a new development proximate to diverse uses or adjacent to connected and previously developed land. It is sprawl plopped into a functioning agricultural area, with no existing infrastructure.** The objectives of the LEED-ND program are clearly compatible and in alignment with the guiding principles of the County of San Diego's General Plan and with the siting of "new green neighborhoods." As a result, it was integrated into the Leapfrog policy of the General Plan. Any proposed deviation from LEED-ND, such as ignoring siting criteria, size restrictions, and density guidelines, should be evaluated in this context.

C1c-93

5) **The plan does not locate all its residential uses within ½ mile of its "CENTER."** It adds suburban sprawl up to one and a half-miles beyond the one commercial area that is large enough to qualify as a LEED-ND compliant Town Center.

C1c-94

6) **Because a site design is not available for the Town Center area we have no way of knowing whether this area itself complies with LEED-ND standards.** The Specific Plan claims compliance, but this claim is not substantiated or shown.

C1c-95

C1c-91 Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a full discussion relevant to these issues.

C1c-92 through C1c-94  
Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a full discussion relevant to these issues.

C1c-95 For information on the design of the Town Center please refer to the FEIR, Fig. 1-4a (Conceptual Lotting of Lilac Hills Ranch Specific Plan), and to Subchapter 1.2.1. The Specific Plan in Ch. II.B.2 includes a Land Use Plan for the Town Center, in pp. II-13. Chapter III.C.2 covers Zoning Regulations for the Town Center and the Neighborhood Centers, in pp.III-12. Town Center Commercial and Mixed-Use Design Guidelines, in Ch. III.E.1. p.III-30. The Specific Plan contains numerous illustrations of the Town Center architectural and design concepts.

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<p>7) <b>The site is not served by existing water infrastructure that is adequate to serve urban density.</b> Water infrastructure is designed for agricultural users and needs significant revision for high density Urban uses. There is no wastewater infrastructure.</p> <p>8) <b>No water or wastewater service is planned to serve urban development of this area.</b> Arguably the site is within a legally adopted, publicly owned water and wastewater service area. However, if "planned service" means that the current General Plan and the VCMWD's own plans currently call for expansion of the infrastructure required for a project such as this (which they do not), it does not meet this alternative, either. If it means only that a district with those powers exists and encompasses the Project site, then the Project must provide new water and wastewater infrastructure for the project. But it cannot do so because there are no easements the Project controls to establish such service.</p> <p>9) <b>Notably, the Project description itself demonstrates that the SP/GPA cannot satisfy ANY of the 3 OPTIONS for fulfilling the Smart Location REQUIREMENT:</b></p> <ul style="list-style-type: none"> <li>a. It is not an Infill Project</li> <li>b. It is not an Adjacent Site with Connectivity (does NOT have at least 90 intersections/square mile as measured within a 1/2-mile distance of a continuous segment of the project boundary, equal to or greater than 25% of the project) boundary, that is adjacent to previous development</li> <li>c. The site is not designed as a Transit Corridor or Route with Adequate Transit Service. The only mass transit is two bus routes located 4 miles north of the Project which run the circuit of the 4 Indian Casinos on SR-76.</li> <li>d. None of the LEED ND significant public transit service requirements are met by the proposed circulation system. (e.g. at least 50% of dwelling units and nonresidential building entrances (inclusive of existing buildings) are within a 1/4 mile walk distance of bus and/or streetcar stops, or within a 1/2 mile walk distance of bus rapid transit stops, light or heavy rail stations, and/or ferry terminals, and the transit service at those stops in aggregate meets the minimums listed in Table 1).</li> <li>e. The only transit mentioned by Specific Plan and/or RDEIR is that NCTD <u>might consider a</u> bus stop serving part of the project. This is inadequate.</li> </ul> <p><b>C. Criteria 3: The Accretive SP/GPA fails to provide necessary services and facilities for the intense urbanization being proposed.</b></p> <p><b>1. ROADS. Traffic impacts are significant.</b></p> <ul style="list-style-type: none"> <li>a. <b>The applicant has proposed no acceptable mitigation measures.</b> This SP/GPA will add 5000 urban residents to country roads while</li> </ul>	<p>C1c-96 As discussed in FEIR subchapter 3.1.7 and detailed in the Water Supply Assessment (Appendix Q) and Water Services Report (Appendix T), the project will construct new water and sewer lines, both on- and off-site, along with new on-site storm drain facilities, sized to serve the needs of the project.</p> <p>The project proposes treatment of on-site generated wastewater for the initial phases of development to occur at the VCMWD Lower Moosa Canyon WRF. Also, the project would construct an on-site WRF and associated infrastructure. Subsequent Tentative Maps or Major Use Permits for future phases of the project would be required to provide evidence of adequate wastewater treatment capacity to serve the proposed development. Project Facility Availability Forms would be required prior to approval of any subsequent discretionary applications. Therefore, direct and cumulative impacts associated with wastewater generation and treatment would be less than significant.</p> <p>Because there is adequate water supply to serve the project as determined by the UWMP, and the project design includes construction of all necessary facilities for provision of water service, direct and cumulative impacts associated with the extension of facilities for water supply and service would be less than significant.</p> <p>C1c-97 The commenter incorrectly states the project will not be served by water and wastewater services and is therefore not LEED-ND equivalent. The proposed project is located in the VCMWD which is the service provider for the project. The County of San Diego Board of Supervisors Policy I-84 requires the submittal of a Project Facility Availability form from the facility provider, indicating whether the facility provider can potentially provide facilities to serve a project. The forms also allow facility providers to recommend specific requirements that may be made conditions of project approval. The VCMWD has provided Project Facility Availability Forms (FEIR, Appendix R) from the VCMWD for both sewer and water, which indicate that the project is in the district, and service and facilities are expected to be available within the next 5 years. The Specific Plan addresses onsite land uses including the possible construction of an onsite water reclamation facility.</p>
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	<p>C1c-98 Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a full discussion relevant to these issues.</p> <p>C1c-99 Refer to response to comment C1c-18. The project would not reduce road widths or design speeds relative to those conditions that presently exist. In addition, the project would not compromise the safety of area residents. None of the road exception requests would compromise safety of area roadways.</p> <p>Regarding the LOS D standard for County roadways, the project is consistent with the General Plan Mobility Element, which authorizes LOS E/F under certain circumstances. Policy M-2.1 applies to the County Mobility Element road network and roadway capacities (classifications) required to handle the traffic under build-out of the General Plan. As stated in the text box adjacent to policy M-2.1 in the General Plan, the end of the Mobility Element chapter includes a list of roadways that have been accepted to operate at LOS E/F under the buildout scenario (Table M-4).</p> <p>The project is consistent with policy M-2.1 because all roadways would operate at LOS D or better under the buildout except for eight roadway segments as described under FEIR section 2.3.3.2. The roadway segments that are not currently in Table M-4 are proposed to be added as part of the projects General Plan Amendment with rationale for why the road should be accepted at LOS E/F and adding travel lanes is not justified. As a result of the proposed General Plan Amendment, the project would be consistent with policy M-2.1.</p> <p>The policy does not apply to a projects direct or cumulative traffic impacts; however, with mitigation, the project's significant impacts to County Mobility Element roads would be mitigated to LOS D with two exceptions: Impact TR-16: Pankey Road, between Pala Mesa Drive and SR-76, and Impact TR-12: Gopher Canyon Road, between E. Vista Way and Little Gopher Canyon Road. The EIR determined that mitigation for these two road segments would be infeasible, as discussed in section 6.4 of Appendix E of the FEIR, because the cost of the required improvements is not roughly proportional to the impact of the project. Mitigation measures must be roughly</p>
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	<p>C1c-99 (cont.)</p> <p>proportional to the environmental impacts caused by the project. (CEQA Guidelines, section 15126.4(a)(4)(B).) Therefore, these impacts would be significant and unmitigable, and the impacts are fully disclosed in the FEIR for consideration by the decision maker.</p> <p>It should be noted, however, that the segment of Pankey Road between Pala Mesa Drive and SR-76 is currently required to be improved to the Mobility Element Road Classification of 2.1A, in compliance with General Plan Mobility Element Policy 2.1, as a condition of the previously approved Campus Park and Meadowood projects and, therefore, as improved, the segment would operate at an acceptable LOS.</p> <p>As to Gopher Canyon Road, although the segment between E. Vista Way and Little Gopher Canyon Road will operate below LOS D, there is no inconsistency with the General Plan. Under Mobility Element Policy M-2.1, LOS E/F is acceptable when congestion on State freeways and highways causes regional travelers to use County roads, resulting in congestion on the County road network. In this case, Gopher Canyon Road is heavily used as a “cut through route” for regional travel. I-15 approaching SR-78, and SR-78 between San Marcos and I-15, both operate at very poor LOS F conditions with long delays during peak periods. In fact, this portion of SR-78 is routinely listed as one of the most congested freeways in all of San Diego County. Because of this congestion, Gopher Canyon Road between I-15 and East Vista Way is used as a route to avoid the I-15 and SR-78 corridors.</p> <p>As discussed in this EIR, potential mitigation measures that would provide additional capacity to I-15 and, as a result, likely reduce some of the “cut through traffic” are infeasible. As to SR-78, planned future improvements consist of one additional high occupancy vehicle (HOV) lane in each direction. However, the additional HOV lanes will not be constructed for many years and, once constructed, would not appreciably reduce cut-through traffic. Furthermore, while the project would coordinate with NCTD/MTS and SANDAG as to the future siting of transit stops/stations on the Project site through the proposed Transportation Demand Management Program, such actions would not reduce existing (i.e., non-Project) traffic levels. Therefore, even though Gopher Canyon Road would operate at worse than LOS D, the LOS would comply with Mobility Element Policy 2.1.</p>
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reducing road widths, reducing road design speeds and ignoring other standards established for safe, efficient transportation. The proposal:

- Fails to provide necessary services and facilities
- Is inconsistent with GP premises that development will pay for itself;
- Is inconsistent with the GP minimum standard for LOS D on County roads;
- Compromises the safety, comfort and quality of life of prospective residents as well as all the other residents of Valley Center who depend on these Mobility Element roads.

C1c-99 cont.

For the Accretive project proponents to be angling for approval to shirk necessary County road standards while at the same time claiming to provide necessary services for this intensely urbanized Village project is a disingenuous contradiction. Sanctioning these exemptions would create significant long term SAFETY and liability issues for the County of San Diego.

C1c-100

**b. The applicant's request for ten (10) modifications to the County road standards will REDUCE road capacities to sub-standard levels.** Accretive Investment Group proposes Village development of a rural area. But the applicant **does not propose Village capacity roads that are necessary to accommodate the traffic that will be generated by their Village project.** Incongruently, the applicant proposes ten (10) modifications to the County Road Standards that will *reduce capacities* of roads that were planned in the Mobility Element to accommodate less intense Rural and Semi-Rural residential development that is planned for this area.

C1c-101

One purpose of the General Plan Mobility Element and the County Road Standards is to specify road standards and automobile capacities that are necessary to serve surrounding land uses throughout the County. Land Use and Mobility Elements are tightly coordinated. Village-capacity roads are specified as necessary to serve Village land uses. Presumably decision makers will agree that road capacity standards set by the County GP Element and the County Road Standards are "necessary" standards.

However, Accretive Investment Group proposes to compromise standards that are employed uniformly across the County in order to win for themselves entitlements to urbanize land uses -- without responsibility for urbanizing road capacities. Specifically, they propose to add 20,000 Average Daily Trips to Mobility Element roads, and to pass the real costs of improving these roads on to the taxpayers. Further, they are finagling "consistency" with County planning standards pretty much across the board not by complying with them, but by relaxing them.

For example, their proposal is to **DOWNGRADE** West Lilac Road

C1c-100 The comment raises concerns with respect to hazards associated with the roadway network. All of the exceptions being requested for the roadway improvements, were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions could be granted by the County where capacity and safety are not unduly affected. (FEIR, subchapter 2.3.2.3.) Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that overall the road network design for the project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant.

C1c-101 Refer to response to comments C1c-3 and C1c-18. The project would fund all required improvements that are feasible. All potential impacts, mitigation and significant and unavoidable impacts are adequately disclosed in the FEIR.

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from its current Class2.2C to a reduced-capacity Class 2.2F. And then, they further propose that two segments of West Lilac Road and one segment of Old Highway 395, which will operate at unacceptable Levels of Service E and F as a result of their new "Village" be sanctioned as official "exceptions" to the County standard for minimum Level of Service. TIF fees of approximately \$5 Million are utterly inadequate to afford the road reconstruction necessary to service this development's traffic. The Valley Center Road widening five years ago cost in excess of \$50 Million. Road improvements in already-urban places are expensive.

In remote places such as the project site road improvement costs are enough to kill projects. No doubt recognizing this problem, the proponents themselves argue *against* improving roads to capacities that are necessary. They say to do so:

- is too difficult and costly
- will require rights-of-way that may be unobtainable
- will be time consuming to construct
- will be disruptive to off-site property owners
- will face opposition from existing neighbors
- will require condemnation of right-of-way
- will impact biological open space.

These are, of course, the exact reasons why the San Diego General Plan and LEED Neighborhood Development both direct urban development away from undeveloped sites like this one into areas where necessities and amenities required for urban dwellers are already met. You'll recognize these points in the review of General Plan and Community Plan policies that follows.

Once again we must acknowledge that these applicants are not envisioning or proposing an SP/GPA to implement the County's widely-recognized and well-admired 30-year plans for genuinely-sustainable growth. This would be the right approach. To engender this sort of cooperation is also the intended outcome of the County's substantial and ongoing investment of public funds in planning efforts and planning activities.

To the contrary, this project hijacks the language of sustainability to push through a proposal which, if approved, will disintegrate San Diego's effort to lead the nation in this area. This project is NOT "sustainable" development. This SP/GPA requires an array of *exemptions* from the interdependent planning principles, goals, policies and standards that the County has put in place in order to achieve its Vision for sustainable development. (Why invest public funds in planning, we ask, if the next step is to invest more public funds in a "review" that ignores the plan?)

C1c-101  
cont.

C1c-102

C1c-102 The project has been designed to meet an equivalent of LEED-ND. Refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for details on how the project is equivalent to LEED-ND, including the location requirements.

c. **Accretive does not have legal right of way to build most of the indicated off-site road improvements.** The project is proposing eminent domain to seize the private properties of others.

d. **Nor do they have the legal rights to land necessary for improving intersections.** Additionally, in order to meet the County Road Standards, two out of four secondary access intersections (Covey Lane and Mountain Ridge) with public roads will require the use of County prescriptive rights (for continual brush clearance) and eminent domain (to secure land from unwilling property owners). Accretive Investments has filed Sight Distance Analyses on these two intersections that confirm the above assertion.

C1c-103

**2. The SP/GPA fails to meet 5-minute response time for Fire and Emergency Medical Services.** The Deer Springs Fire Protection District has commented in writing that none of the proposed options listed in the Specific Plan and Fire Protection Plan are feasible solutions for the District to meet the 5 minute emergency response requirement for Lilac Hills Ranch.

C1c-104

**3. The project fails to present a legal and viable point design for sewage and wastewater treatment.** The applicant's preferred option lacks legal right of way for offsite sewer and recycled water pipelines.

C1c-105

**IV. The project design also defies the GP principles, goals and policies for Village development, and for Village expansion, which the Community Development Model reflects.**

C1c-106

1. The 608-acre project site, only a portion of which is actually owned by the applicant, sprawls 2 miles N-S, and 2 miles E-W across several thousand acres, largely in active agriculture. These surrounding acres are owned by people whose dreams and ambitions for their rural properties are in accord with the Community Development Model's Regional Category assignment: Semi-Rural and Rural.

C1c-107

2. The sprawling site creates some 8 miles of edge effects that will threaten surrounding agriculture, horticulture and animal husbandry that the GP Community Development Model protects by designating this area for Semi-Rural and Rural development. This sprawling shape also increases the likelihood that the proposed project will be growth inducing as previously mentioned.

C1c-108

3. With 1746 units and 90,000 SF of commercial on 608-acres, there is insufficient land available for "feathering" residential densities as the Community Development Model intends and describes.

C1c-109

4. The site requires 3 separate commercial nodes to support the "walk-able" claim. It is more than a stretch to characterize the project as a "walk-able Village" when it is, in fact three circles of dense housing. Two of them are at least a mile from what the Community Development Model would characterize as Village

C1c-110

C1c-111

C1c-103 The need for easements and use of eminent domain is not an environmental issue under CEQA as obtaining easements would not result a physical change in the environment. With respect to the issue of sight distance, please refer to Global Response: Easements (Covey Lane and Mountain Ridge Roads) for a thorough discussion on related topic. Also see Off-site Improvements–Environmental Analysis and Easement Summary Table for a thorough discussion regarding rights to build off site improvements.

C1c-104 The commenter raises a concern about project fire response times. Please refer to Global Response: Fire and Medical Services for a thorough discussion on related topic.

C1c-105 The proposed project is located within the VCMWD boundaries which is the service provider for the project. The County of San Diego Board of Supervisors Policy I-84 requires the submittal of a Project Facility Availability form from the facility provider, indicating whether the facility provider can potentially provide facilities to serve a project. The forms also allow facility providers to recommend specific requirements that may be made conditions of project approval. The VCMWD has provided Project Facility Availability Forms from the VCMWD for both sewer and water, which indicate that the project is in the district and eligible for service and facilities are expected to be available within the next 5 years.

The Specific Plan addresses onsite land uses including the possible construction of an onsite water reclamation facility.

The FEIR (Chapter 3) described several alternatives for treatment of wastewater, both on and offsite as requested by VCMWD. The FEIR also includes alternative routes for wastewater transmission lines. The project applicant would implement either option for wastewater treatment as approved by the VCMWD. VCMWD has conceptually approved the Wastewater Management Report for Lilac Hills Ranch which provides additional information about all treatment options.

With respect to the comment related to having sufficient right of way to construct the sewage forced main or recycled water lines, four alternative pipeline routes are included in the Wastewater Management Alternatives Report of the FEIR (see, Appendix S).). Alternative 4 utilizes Covey Lane, West Lilac Road and Circle R Road to reach the Lower Moosa Wastewater Treatment Facility.

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	<p>C1c-105 (cont.)  This alternative does have any new impacts to undisturbed land because the pipeline would be located within existing roadways. FEIR subchapters 1.2.1.7 and 3.1.7.2 has have been revised to clarify that additional alternative routes for sewer lines have been considered and analyzed. See also, Off-Site Improvements – Environmental and Easement Analysis Summary, which describes the respective off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties for the sewer alternatives.</p> <p>C1c-106 Refer to Global Response: Project Consistency with General Plan Policy LU-1.2.</p> <p>C1c-107 The comment provides factual background information, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue with respect to the FEIR, no further response is required.</p> <p>C1c-108 With respect to the comment raised regarding protecting Semi-Rural and Rural development please see response to comment C1c-14 above. With respect to potential impacts to agricultural resources resulting from potential edge effects are analyzed in subchapter 2.4 and Appendix F. The project would implement mitigation measures such as fencing and buffering with orchard trees to ensure the project does not create a land use conflict with surrounding operations. With implementation of the mitigation measures identified in the FEIR, impacts would be reduced to less than significant. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for additional discussion of consistency with the Community Development Model. In addition, the project features community gardens, orchards, and will encourage farmers markets. See also Global Response: Agricultural Resources, Indirect Impacts.</p> <p>C1c-109 The commenter raises concern that the project could be growth inducing. The FEIR in subchapter 1.8 was revised. It analyzed various factors, including project density, additional housing, roadway construction, public facilities, fire and emergency services,</p>
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	<p>C1c-109 (cont.) schools, and water and wastewater services, and concludes that the project could be growth inducing due to the intensification of uses on-site, lower fire response times to the vicinity, and expansion of water and sewer infrastructure. However, potential impacts are too speculative for evaluation in this FEIR because the specific nature design and timing of future projects is unknown at this time.</p> <p>C1c-110 Please see response to comment C1c-16 above. Please also refer to Global Response: Project Consistency with General Plan Policy LU-1.2.</p> <p>C1c-111 The comment asserts the project is not walkable. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2. Refer also to response to comment C1c-20, C1c-21, and C1c-23. With respect to the comment that the Town Center is more than one and one-half miles as compared to the one-half mile standard, the commenter provides no information with respect to what uses are being measured in coming to this conclusion.</p>
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<p>amenities. The LEED ND standard for "walking distance" is ½ mile, the GP also cites ½ mile (GP, p.3-8).</p> <p>5. This is not the "walk-able" compact Village it pretends to be. The "Town Center" is more than one and a half miles from the ½ mile standard required by LEED ND and cited in the General Plan.</p> <p>6. The proximity of Rural Lands to the project presents wildfire threats, which the applicant's Fire Protection and Evacuation Plans recognize but fail to adequately mitigate. In addition to wildfire the Accretive project adds the additional hazards of Urban Multi Story Structure Fires and nearly two orders of magnitudes increased volume and complexity of Emergency Medical Services (EMS). The Accretive Fire Protection Plan barely mentions the Structures and EMS hazard potential, let alone any mitigation plans. The Deer Springs Fire Protection District (DSFPD) has gone on the record three times (6/12/2012, 3/5/2013 and August 7, 2013 stating that DSFPD has major issues with the Project as proposed. Accretive has glossed over these issues raised by a Public Safety agency and the County has allowed the Project to proceed in the General Plan Amendment process.</p> <p><b>V. The Accretive S/GPA is also inconsistent with the Purpose, Intent and Guiding Principles of the County General Plan.</b></p> <p>Chapter 3 of the RDEIR purports to be analysis of issues, which, it concludes, have No Significant Impact. RDEIR 2014 takes the giant illogical leap, to conclude that merely by adopting a different Land Use Map, all General Plan inconsistencies disappear.</p> <p>Our comments below highlight a few (due to time and space constraints) of the MANY inconsistencies and issues with the County General Plan that this project has failed to confront or remedy, and that RDEIR 2014 fails even to identify.</p> <p><b>A. Purpose of the General Plan.</b> Chapter 1 of the General Plan contains in its Introduction and Overview an array of directives that the applicant, the applicant's consultants and the DPS staff have ignored.</p> <p>The statements that follow, and many others that appear on several hundred pages of the County General Plan, reflect what many citizens believe is a social contract between San Diego County government and the people. To overlook these declarations in the review of this project would be a gross violation of the public trust. Here are a few ...</p> <p><i>(p. 1-4.)</i>  <i>1. The General Plan must be referred to in its entirety, including separately bound portions (such as community plans). While the GP is internally consistent, some issues are addressed through multiple policies and some receive refined and more detailed direction in Community Plans (p. 1-4.)</i></p>	<p>C1c-112 Fire hazard. The Fire Protection Plan (FPP) evaluated the fire hazard of the area and the potential effects on the project, as well as the potential increased hazard that may result from implementation of the proposed project. A wildland Fire Behavior Assessment was included in the FPP to provide four worst-case scenarios for wildland fires. As a result of the findings of the fire modeling, project design features were incorporated into the project in order to reduce the risk of fire hazard, including fuel modification zones, use of ignition resistant building materials, and the provision of secondary emergency access roads. The project would also meet all fire and building code requirements, and an adequate supply of water for fire hydrants was deemed available (see Appendix T). The Draft FEIR analyzed each of the design features to determine whether the features would reduce the risk of exposure of people or structures to a significant risk of loss, injury or death from wildland fires. The FEIR found that with the adoption of Mitigation Measure M-HZ-1, impacts to wildland fires would be reduced to less than significant. (FEIR, Subchapter 2.7.2.4, and) Subchapter 2.7.3.4 of the FEIR also identified that the project's contribution to a potential cumulative impact would be less than cumulatively considerable with respect to wildland fire hazards based on implementation of the FPP, associated landscaping plans.</p> <p>The Evacuation Plan (FEIR Appendix K) considers both evacuation and first responders traffic, as shown by it stating the following: "[d]uring an emergency evacuation from the proposed Lilac Hills Ranch development, the primary and secondary roadways will have to be shared with responding emergency vehicles..." As indicated in the FEIR subchapter 2.7.6, impacts associated with emergency response and evacuation plans would be less than significant and no mitigation is warranted. The evacuations will be implemented in phases, based on predetermined trigger points, so smaller percentages of the evacuees are on the road at the same time. When a wildfire occurs, if it reaches a predetermined trigger point, then the population segment located in a particularly vulnerable area downwind of that trigger point would be evacuated. Then, when the fire reaches the next trigger point, the next phase of evacuation would occur. This would allow smaller groups of people and correspondingly fewer vehicles to more freely evacuate areas. The Evacuation Plan determined that the location of the project and the existing and planned roads provide adequate multi-directional primary and secondary emergency evacuation routes (Evacuation</p>
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	<p>C1c-112 (cont.)</p> <p>Plan, page 8). The comment asserts that the FPP does not sufficiently address structure fires or emergency medical services such that the impact and mitigation can be assessed. The Capabilities Assessment evaluated three separate response scenarios, including a structure fire, a wildland fire with structural threat, and a medical aid response. The response routes included one from each of the four existing stations providing service to DSFPD (Stations No. 11, 12, 13, and 15). In addition, structure fires are included in analyzing the call load data and was included in the call volume and is a part of the evaluation. The data indicated that a very large volume of responses for DSFPD is for medical aid (37 percent), traffic collisions (11 percent), and cancelled calls (17 percent). Based on this data, and the information presented in the District Capabilities Assessment (Dudek &amp; Hunt 2014) the FPP concluded that DSFPD would have the existing capacity to respond to all of these types of expected calls from the proposed Lilac Hills Ranch project (see APPENDIX 'K' - 2005–2011 Response Data for Deer Springs Fire Protection District). (See section 4.1 of the FPP) Also, the project includes design features for new development in Wildland Urban Interface areas to minimize structural ignitions as well as providing adequate access by emergency responders. (See Section 1.1.2 of the Capabilities Assessment.) Fire protection measures for individual commercial/structure and other public facilities will be established in accordance with the requirements of the County Consolidated Fire Code and California Building Code. (Section 4.9 of the FPP) The County of San Diego and the DSFPD will review all proposed building plans for compliance with the requirements of fire codes and FPP. Also the FPP includes specific performance standards that may be applied to commercial, industrial, school, age-restricted community, and other public facilities structures on the project site to reduce fire hazards (see Appendix J, section 4.7).</p> <p>The comments from DSFPD that are referred to herein are out of date and do not reflect the new comment letter provided by DSFPD, dated July 28, 2014. See Global Response: Fire and Medical Services.</p>
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	<p>C1c-113 The comment mischaracterizes the analysis in the FEIR with respect to the project's consistency with the General Plan. The proposed project includes a General Plan Amendment to the General Plan Regional Land Use Map to change the regional category designation of the project site from Semi-Rural to Village, which has been analyzed to be consistent with General Plan Policies LU-1.1 and LU-1.2. The project also proposes to amend the Valley Center and Bonsall Community Plans and rezone the project site to be consistent with the proposed change to the General Plan Land Use Map. The FEIR frames the General Plan consistency analysis in subchapter 1.4 under "Environmental Setting," and describes its current land use planning context including current general plan land uses and both community plans. (FEIR, Ch. 1.4, pp. 1-38.) Subchapter 1.6 describes the General Plan amendment required for approval of the project and that is analyzed by the FEIR. The General Plan Regional Land Use Map is proposed to be amended to remove the existing regional category and land use designation and to re-designate the project area as Village. The FEIR subsequently provides detailed analysis of the physical environmental impacts that may flow from the GPA in Chapters 2 and 3, as well as providing a detailed policy consistency analysis in the Land Use Planning section, subchapter 3.1.4 (See FEIR, Chapter 3.0; Appendix W). Therefore, the FEIR analyzes the potential physical environmental impacts that would result from project approval and the amendment of the Regional Land Use Element Map to change the regional land use category from Semi-Rural to Village.</p> <p>C1c-114 The comment does not raise an environmental issue, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p>
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(p. 1-5)

1. Policies cannot be applied independently (p. 1-5).  
2. If you are a SD County resident or property owner, the GP indicates the general types of uses that are permitted around your home and changes that may affect your neighborhood, and the policies the County will use to evaluate development applications that might affect you or your neighbors. The Plan also informs you regarding how the County plans to improve mobility infrastructure, continue to provide adequate parks, schools, police, fire, and other public services, protect valued open spaces and environmental resources, and ...

3. Future development decisions must be consistent with the Plan.

4. The essence of the Plan lies in its goals, policies, and implementation programs.

5. Policies provide guidance to assist the County as it makes decisions relating to each goal and indicates a commitment by the County to a particular course of action.

C1c-114 cont.

**B. General Plan Guiding Principles.** The General Plan's Guiding Principles also are more than empty words that are subject to manipulative and self-serving interpretation. These Guiding Principles – for the countywide consortium of stakeholders who nursed this language for many months before we endorsed it -- were intended to actually GUIDE development and conservation in San Diego County.

Advance Planning Staff worked with hundreds of citizens, property owners, real estate developers, environmentalists, agricultural organizations, building industry representatives, and professional planners, for years to create a General Plan that would build what we need, and conserve what we must. These Guiding Principles gave birth to the Community Development Model, and to the systematic method through which planning principle, and the County's commitment to authentic sustainable development, was transferred from human hearts and minds to the ground.

C1c-115

The RDEIR should, but does not, thoroughly discuss and analyze the GP Guiding Principles (GP pp. 2-6 through 2-15), but merely cursorily sets them out and in some cases, gratuitously, without reference to factual aspects of the Accretive project, asserts compliance.

The following is a more respectful review of the **San Diego County General Plan's Guiding Principles** and their application to this project:

**GUIDING PRINCIPLE 1. Support a reasonable share of regional population growth.** The RDEIR fails to note that the GP establishes Valley Center's "reasonable share" at 36,000 at build-out, not the 41,000-plus that would result from this project's plopping of a new city in the middle of a well-functioning agricultural area. This population increase is not recognized, analyzed or justified.

C1c-116

C1c-115 The commenter questions the project consistency with the ten General Plan Guiding Principles. All the goals and policies of the General Plan are based upon these principles which are set forth in Chapter 2 of the General Plan. (General Plan, p.2-6) The FEIR analyzes whether the project meets the ten Guiding Principles by its analysis of the appropriate policies that implement those principles throughout each of the subchapters of the FEIR and in Appendix W.

C1c-116 Refer to Comment C1c-6, C1c-7, and C1c-11 above.

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<p>a.) The General Plan already accommodates more growth than SANDAG projects for 2050. The RDEIR fails to justify the need for 1746 additional homes, 90,000 additional SF of commercial.</p> <p>b.) There are significant environmental and planning consequences from providing an excess of housing and employment in a rural area that are not addressed in the RDEIR:</p> <ul style="list-style-type: none"> <li>i. As a region, with SANDAG providing coordination, we have been trying to steer growth to incorporated cities where transportation investments are occurring and goods, services, and employment are in abundance. The proposed project undermines this effort. It contradicts growth principles that all jurisdictions have developed through SANDAG and conflicts with the Regional Transportation Plan and Sustainable Communities Strategy (SCS).</li> <li>ii. The SCS is the region's strategy for addressing GHG emissions targets for land use and transportation yet the RDEIR fails to address the consequences of the proposed project conflicting with it.</li> <li>iii. By providing a glut of housing in a rural area, the proposed project throws a wrench in the region's growth strategy. The provision of more homes in Valley Center will reduce the demands for homes elsewhere. Generally, it has been the incorporated cities that have needed to plan for more homes to accommodate future regional growth. The proposed project will eliminate that need by 1746 homes. If built in the incorporated cities pursuant to regional plans, these homes would have shorter vehicle trip lengths, be closer to transit, jobs, and services, and use less water and electricity. The RDEIR fails to address these consequences.</li> </ul> <p>c.) There are also impacts of providing excessive commercial uses. The proposed project plans for commercial uses in excess of local and regional forecasted needs. There are two possible consequences of this situation:</p> <ul style="list-style-type: none"> <li>i. The commercial space in the proposed project will never be filled, the town center will never be a center, and there will be nothing to walk to if you wanted to walk 2 miles from one end of the development to the town center;</li> <li>ii. The proposed project will pull commercial uses from other existing commercial areas nearby such as the Valley Center and Bonsall town centers. This will result in vacancies and blight in these village centers and will undermine their growth strategy and vision.</li> <li>iii. The RDEIR needs to include a comprehensive economic study of the proposed project and its economic viability within the context of community and regional plans. The results of such a study will be the grounds for the evaluation of additional environmental consequences of the project.</li> </ul> <p><b>GUIDING PRINCIPLE 2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services and jobs in a</b></p>	<p>C1c-116 cont.</p> <p>C1c-117</p> <p>C1c-118</p> <p>C1c-119</p> <p>C1c-117 Additional information was added to subchapter 3.1.4.1 of the Final EIR, to include a project consistency analysis with relevant policies of SANDAG's Regional Transportation Plan (RTP) and its Sustainable Community Strategy (SCS). Information was also added to subchapter 3.1.4.1 pertaining to the Regional Comprehensive Plan (RCP) adopted by the SANDAG Board of Directors in 2004, which serves as a blueprint for the region's future growth and development. SANDAG is currently working on an effort to merge the RCP with the 2050 RTP and the SCS. This effort is known as San Diego Forward: The Regional Plan and is scheduled for adoption in 2015. As explained in subchapter 3.1.4.1, the Project would not be in conflict with the objectives of the 2050 RTP/SCS and RCP. Potential impacts associated with plans or policies would thus be less than significant.</p> <p>Although the commenter is correct in that the 2050 RTP and its SCS will guide the San Diego region toward a more sustainable future by focusing housing and job growth in urbanized areas, the county's General Plan forecasts future housing growth in the County shown on Table 1-3 of the General Plan. Table 1-3 represents a forecast of possible future housing growth within the County from 2008 to build-out. However, actual development in any city or county is a result of market forces, population growth (including birth rates and immigration) as well as physical constraints as described above, availability of resources and other federal, state and local regulations. The County has only limited control over growth and cannot control external factors such as market demands and the intent of individual property owners, businesses and citizens. While population growth and associated development through the horizon year of the General Plan can be considered reasonably foreseeable, the County's population forecast is regional in scale and potential development on any particular parcel cannot be certain at a general plan level. (See General Plan Update FEIR, Chapter 1.0, pp 1-17 and 1-20, which pages are incorporated herein by reference. ) Thus it is reasonably anticipated that as the General Plan is amended over time, housing forecasts can be adjusted appropriately. The 2050 RTP/SCS also contemplates that implementing the RTP/SCS will require close collaboration among and between SANDAG, local jurisdictions, member agencies and regional stakeholders. It is anticipated that with each RTP (every four years) amendments would be made to reflect current conditions and new opportunities to help reduce GHG emissions.</p>
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**compact pattern of development.** The project and RDEIR completely ignore this principle (and its implementing Goals and Policies) with the fiction that merely adopting a map with different land use designations for 608 acres they have owned or optioned will miraculously create compliance with the County General Plan.

The GP and VC Community Plan -- without this project -- currently embodies this Principle, with the design for the central Villages and the feathered-out supporting semi-rural and rural designations. This project would destroy that design and compliance.

As previously discussed, the Accretive project site lacks both existing and planned infrastructure. Infrastructure proposed by the project cannot be provided at a level consistent with County standards. Further, as discussed, the proposed project is not a compact pattern of development. It sprawls over 2 miles and has to include 3 town centers rather than 1 to justify the claim that it is "walkable" and thus, presumably, compact.

C1c-119  
cont.

**GUIDING PRINCIPLE 3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.** This project recognizes this Principle only in its abuse. Nowhere does the RDEIR recognize or analyze the impact of the Project on the existing and proposed central Village economy and character. Worse, in its insubstantial discussion of the key CEQA issue of "Divide an Established Community" the RDEIR states that there is no established community! (RDEIR 3.6.5, p. 3-120.) and thus there is no need to address this issue in the RDEIR. The central valley villages DO exist, they are the heart of the existing community, and they are where the GP and CP plan Valley Center's future growth is consistent with the General Plan. This issue must be fully analyzed in the RDEIR. See above for more discussion on these concerns.

C1c-120

C1c-121

**GUIDING PRINCIPLE 4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.** Instead the Project proposes bulldozing 4 Million cubic yards of natural hills to make manufactured slopes, to accommodate an urban-styled city in an active agricultural area.

C1c-122

**GUIDING PRINCIPLE 5. Ensure that development accounts for physical constraints and the natural hazards of the land.** Instead the Project proposes bulldozing 4 Million cubic yards of natural hills to make manufactured slopes, to accommodate an urban-styled city in an active agricultural area.

C1c-123

**GUIDING PRINCIPLE 6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development**

C1c-124

C1c-117 (cont.)

Although the General Plan has directed growth to certain areas within the community planning areas of Valley Center and Bonsall for development, General Plan Policy LU-1.2 provides a degree of flexibility to the General Plan to accommodate additional population increases as necessary in a manner that meets the requirements of the SCS and the General Plan. The General Plan clearly allows for future amendments to the Land Use Map and Regional Categories Map and is intended to be a dynamic document and provides that amendments will be reviewed to ensure that the change is in the public interest and would not be detrimental to public, health, safety, and welfare. (General Plan, page 1-15). The project is amending the General Plan by adding a new Village that meets the criteria of Policy LU-1.2. The project is a new Village whose structure, design and function are based on the Community Development Model. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a full discussion relevant to these issues.

It should also be noted that SANDAG's SCS, including the forecasted development pattern, is not intended to regulate the use of land, as explicitly provided by the California Legislature when enacting SB 375. Rather, pursuant to Government Code section 65080(b)(2)(K), the SCS does not regulate the use of land; does not supersede the exercise of the land use authority of cities and counties within its region; and, does not require that a city's or county's land use policies and regulations, including its general plan, be consistent with it.

C1c-118

There is no evidence that the commercial space in the project will never be filled. While economic and social effects ordinarily need not be discussed in an EIR, physical changes, such as blight, are secondary impacts that must be analyzed if they are significant. The potential for commercial uses in the project causing blight to other parts of the community planning area is too speculative. The commercial uses intended for the project will be sized to meet the needs of the project. The Specific Plan design guidelines for the Town Center and Neighborhood Centers discourages big box type commercial uses within the project area. Conceptual illustrations are found in the Specific Plan at Figures 74 through 93.

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	<p>C1c-119 The commenter states that the project is inconsistent with (the FEIR ignores) Guiding Principle 2, in particular that the project site lacks both existing and planned infrastructure and is not a compact pattern of development.</p> <p>The General Plan includes a section titled “How to Use the General Plan” in Chapter 1 (pages 1-4, 1-5 and 1-6), which explains how the General Plan is to be used and implemented. The General Plan explains that the Vision and the ten Guiding Principles provide the overarching themes that guided the development of the goals, policies and implementation programs. However, the General Plan policies actually guide decision-making. (page 1-7) Policies are described as assisting the County as it makes decisions related to each goal and indicated a commitment by the County to a particular course of action. The General Plan also states that the “policies contained within this General Plan were written to be a clear statement of policy but also to allow flexibility when it comes to implementation. Policies cannot be applied independently; rather, implementation of the policies must be balanced with one another and will address details such as how and when the policy is applied and any relevant exceptions. For example, a policy to conserve open space is not a mandate for preservation of 100 percent of the existing undeveloped land in the County. It must be balanced with other policies that allow development and other uses of the land. In this case, implementation of the policy in new developments will be achieved through regulations such as the Resource Protection Ordinance, Biological Mitigation Ordinance, and California Environmental Quality Act, which will guide to what degree open space must be conserved.”</p> <p>Amendments to the General Plan are allowed by specific policies, including LU-1.2 and LU-1.4, which allow the creation of new villages or the expansion of existing villages under certain circumstances. This would mean that future amendments to the Land Use Map and Regional Categories Map were contemplated when the General Plan was updated.</p> <p>In the context of Guiding Principle 2, the word “planned infrastructure” would mean infrastructure that is designed or planned as a part of a project or new development. There are numerous policies that are consistent with this explanation. Policy LU-12.4 provides that infrastructure must be planned and located in a manner</p>
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	<p>C1c-119 (cont.)</p> <p>compatible with community character and minimizes environmental impacts. Policy LU-12.1 requires infrastructure needed for new development to be provided prior to that development or phased to coincide with project phasing. As explained by the General Plan: "Unchecked growth and new development can easily transform a community. However when planned and implemented wisely, growth can be beneficial to a community's identity, economy and character." ( page 3-28)</p> <p>As detailed in Chapter 1 of the FEIR, the project would provide water and sewer infrastructure to serve the project. If approved by the decision makers, the project would be conditioned to fund, and construct the roadways. The project would also be conditioned to provide The project would be responsible for funding the construction/ improvement of roadways and provision/extension of public facilities including wastewater, recycled water, and imported water infrastructure, which would be sized to serve the project's population. There are numerous policies in the General Plan that will assure that the project will provide the infrastructure needed to serve the project. These policies include Policy 9.4 that require infrastructure improvements be prioritized to provide public facilities for Villages and community cores that are sized for the intensity of development in such areas. Infrastructure improvements will follow the phasing plan outlined in the Lilac Hills Ranch Specific Plan. This will ensure that adequate infrastructure is available to each phase of development at the appropriate time as required to implement Policy 9.4. See also the discussion in the EIR regarding the transportation system network, sewer and schools at Subsections 2.3, 3.1.7, and 3.1.5 respectively and Appendix W regarding General Plan Policy conformance.</p> <p>With respect to the comment related to the project's compact design, the project is designed to be LEED-ND or equivalent Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a full discussion relevant to these issues.</p>
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	<p>C1c-120 The text relating to Guiding Principle 3 states that new development should be designed to retain and enhance community character. It also states that an economically viable community provide a diverse range of housing for all income levels. The project complies with this Guiding Principle as it is consistent with the policies of the Valley Center Community Plan (FEIR Subchapter 3.1.4), conforms with the Community Development Model and is consistent with the Valley Center Design Guidelines (FEIR subchapter 2.1.2.6), is consistent with Goal 1A (Community Character Goal) of the Valley Center Community Plan (FEIR Appendix W), and is consistent with Goal LU-2 (Rural Character) and related policies of the General Plan (FEIR Appendix W). Further, the project complies with this Guiding Principle as it provides a diverse range of housing types, including for seniors, as part of the Specific Plan (FEIR Subchapter 1.2).</p> <p>C1c-121 The commenter raises concern about the project dividing an established community. As the FEIR discusses the project will not divide an established community (FEIR, Subchapter 3.2.4) because the project site is at the western edge of Valley Center and does not serve as a connecting point between community areas. The roadways on-site provide access to the on-site uses but do not provide a connection between community areas. Since the project does not serve as a connection point between community areas, the project would not significantly disrupt or divide an established community. However, the FEIR, Subchapter 3.2.4 has been clarified with respect to the project site, which is currently a mix of undeveloped open space, agricultural uses and rural residences. The project site is located along the western fringe of the rural community of Valley Center. On site, the project site consists of rural residential uses and agricultural land. Although the proposed project would not divide an established community, the project addressed its relationship to existing and planned land uses with adjacent properties. Subchapter 3.1.4.2 evaluated the project's compatibility with surrounding off-site land uses and the project's internal compatibility with existing and planned land uses on site. Compliance with the goals and policies of both Valley Center and Bonsall community plans are detailed in the General Plan Consistency Analysis (see Appendix W) and in subchapter 3.1.4.2. Compliance with the project's design guidelines and other provisions of the Specific Plan assures the project's compatibility with the adjacent off-site land uses and within the project.</p>
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	<p>C1c-121 (cont.) Overall, the project is consistent with the relevant policies of both the BCP and Valley Center Community Plan and land use impacts associated with policy inconsistencies would be less than significant. Also, as detailed in the Agricultural Resources Report (see Appendix F of the FEIR), one of the project's objectives includes the recognition of the existing rural atmosphere of the surrounding area through use of agriculture on-site and provision of transitional features to provide adequate buffering between types of residences and active agriculture. The Specific Plan includes agriculture throughout the project site including common open space areas, biological open space, and manufactured slopes. HOA-maintained agricultural open space would be retained along many of the boundaries of the project site, as agricultural compatibilities buffers including groves of orchard trees, such as avocado and citrus. Other agricultural-related commercial uses may also be established by the project as allowed in the C-36 zones. Project grading would conform to the natural contours of the land and would not substantially alter the profile of the site. Subchapter 2.5, Biological Resources.)</p> <p>C1c-122 to C1c-123 The project is consistent with Guiding Principles 4 and 5. The conservation of sensitive biological habitat is assured through the creation of an on-site open space area as well as the requirement for the project to provide off-site mitigation. The open space will be monitored and managed in compliance with the project's Resource Management Plan. This plan will ensure that the on-site and off-site conservation areas will be maintained in accordance with the County's Resource Protection Ordinance. For details relating to biological resources, please see FEIR subchapter 2.5. Project grading is discussed in Chapter 1.0 of the FEIR. With respect to the net import or export of fill, project construction would be a balanced cut/fill operation as shown on FEIR Table 1-4. However, throughout the phasing of the construction, there are some areas with a net cut and other areas with a net fill. The project will be using those sites with net cut for borrow sites. Phase 3 land will be used as a borrow pit, which use will be required to comply with all applicable government regulations and requirements. In addition, the grading</p>
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	<p>C1c-122 to C1c-123 (cont.) will avoid steep slopes in accordance with the County's Resource Protection Ordinance. The project would avoid geological hazards as described subchapter 3.1.1 Geology and Soils and subchapter 2.7 Hazards and Hazardous Materials.</p> <p>C1c-124 The commenter questions the consistency of the project with Guiding Principle 6, raising specific concerns about project transit, road easements, and fire response times. The Specific Plan includes an Interim Private Transit System to ensure transportation to the regional transit center until regional transportation agencies extend bus service to the project. Additionally, the project includes trails throughout to foster pedestrian and biking as a means of transportation. Please refer to Global Response: Easements (Covey Lane and Mountain Ridge Roads) for a thorough discussion on off-site road easements for Covey Lane and Mountain Ridge Road. Please refer to Global Response: Fire and Medical Services for a thorough discussion on this topic.</p>
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<p><b>patterns and, when appropriate, plan for development which supports public transportation.</b> The Project instead says perhaps NCTD might be interested in a bus stop. It is entirely car-dependent. If approved, there are no commercial, no schools, no parks until phase 3, 6-8 years after plopping phase one houses in the middle of nowhere. The Project does not have legal rights for the required ingress and egress to be able to construct them. If they were constructed, they would undermine connectivity by blocking emergency egress, and detract from supporting community development patterns in the central Villages, where the GP and Community Plans call for potential construction of roads to enhance connectivity.</p> <p><b>GUIDING PRINCIPLE 7. Maintain environmentally sustainable communities and reduce green house gas emissions that contribute to climate change.</b> This Project waives the flag of environmental sustainability at every opportunity, but totally ignores fundamental requirements for building where substantial investments have already been made in urban infrastructure and amenities. Description in the RDEIR of the state and county new requirements for "green buildings" and energy-saving construction and facilities are beside the point. This project destroys agriculture and functioning rural lands that genuine "sustainable development" would be retaining. Further, this "fluff" is purple prose, unsubstantiated and inadequate to determine if the suggestions or promises in the SP are minimum or substantive requirements that warrant the use of "sustainable." LEED building standards, like LEED ND standards are specific, and they are expensive. Suffice to say that nothing about this applicant's performance, so far, suggests exemplary performance. Many more facts are necessary to adequately analyze this issue yet based on the information available, any characterization of the project as "sustainable" is a complete farce and undermines the ability of the public and decisions makers to evaluate the project on its true impacts, characteristics, and merits.</p> <p><b>GUIDING PRINCIPLE 8. Preserve agriculture as an integral component of the region's economy, character, and open space network.</b> Instead the Project would take 504 acres of productive agriculture out of use and replace it with an urban city. The RDEIR relies on a model to devalue existing productive agriculture and ignores the reality that the project site and surrounding area contain some of the most unique and valuable agricultural operations in the region.</p> <p><b>GUIDING PRINCIPLE 9. Minimize public costs of infrastructure and services and correlate their timing with new development.</b> Instead the SP and implementation plan are geared to increase public infrastructure costs while minimizing the Applicant's infrastructure costs, in an area devoid of infrastructure. Plans for construction, instead of concurrent with need, are designed to be significantly after need.</p>	<p>C1c-125 The commenter questions the consistency of the project with Guiding Principle 7, raising specific concerns about the project as a sustainable community. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic.</p> <p>C1c-126 The project's compliance with Guiding Principle 8 is addressed in the discussion of Project Consistency with Applicable Policies (FEIR Appendix F, subchapter 4.2) and the discussion of consistency with General Plan Goal LU-7 (Agricultural Conservation) and the related Policy 7.1 (FEIR Appendix W).</p> <p>C1c-127 The commenter questions the consistency of the project with Guiding Principle 9, raising specific concerns about the cost and timing of project infrastructure. The project would not use any public funds to finance public infrastructure improvements, which may include roads; water lines; sewer lines; fire, police and school facilities; and public transit. All funding would be through private financing mechanisms. With regards to timing, the proposed project and corresponding infrastructure, would be built in five phases over several years. The Specific Plan contains density limits and design guidelines, including the provision of infrastructure to correspond to the new development, that must be followed in order for future implementing maps to be approved and constructed. The Specific Plan meets the requirements of the County and all requirements of Section 65451 of the Government Code. The project will be required to comply with the project Specific Plan, including all required local, state and federal approval, including, as necessary for parks and open space. Please refer to Specific Plan, Section IV.</p>
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**GUIDING PRINCIPLE 10. Recognize community stakeholder interests while striving for consensus.** This applicant has ignored the VC community and its Community Planning Group throughout the entire planning process. Applicant attendance at Planning Group meetings has been by a consultant/lobbyist who never has answers to the questions raised regarding either specifics of the proposal, or the process. Promises to “get back to you about that” never have been kept. Claims that the proponents were “working with the community” are incorrect. They mean that they held private meetings with pre-screened potential supporters, to which the public, and certainly Planning Group Members, were in many cases dis-invited. On the very few occasions the general public was invited, food and story boards were presented, but no detailed oral presentations of the project’s contents, nor public questions were allowed. Approval of the PAA was opposed by staff and the Planning Group and a large percentage of the community; it was obtained from the Planning Commission by a procedural trick on the eve of a major holiday, so no one could know it was being acted on, and could effectively object. At the Board of Supervisor’s hearings on the removal of the improperly-placed Road 3A for the Project, the Applicant denied needing or requesting the road, and pointed to “community support” from the “Valley Center Town Council”, a non-existent organization consisting of 3 Accretive supporters, purporting to represent the “real” Valley Center community, instead of the Planning Group. Numerous Planning Group reviews were required by staff and totally ignored by the Applicant, no changes were ever made in response to any of the community’s comments.

**In short, the applicant has never recognized community interests and has never (unlike all the other developers the community has worked with) sought consensus.**

C1c-128

C1c-128 The County held the EIR scoping meeting, attended a Bonsall community planning group meeting and provided an update, and held two public review meetings on the FEIR (one for the first public review and one for the recirculation).

Section 3.1.4.2 (p 3-64) is titled “Analysis of Project Impacts and Determination of Significance.” Here in the subsection “*Impact Analysis*” analyses of specifics are either missing or inadequate, and replaced with brief descriptions of the project followed by assertions. Examples are rife, here are a few:

C1c-129

C1c-129 See response to comment C1c-113.

1.) Without bothering even to acknowledge the array of GP policies that would have to change in order to approve this SP/GPA, the RDEIR merely asserts the conclusion: “*The proposed project includes a General Plan Amendment which, if approved, would result in the project being consistent with the General Plan.*”

2.) There is no discussion of LEED ND criteria, and the GP Community Development Model is presented as if it is no more than an arrangement of densities rather than a reflection of a whole complex of interdependent ideas about sustainable development. Nevertheless, the RDEIR asserts that “*the proposed project would be consistent with the Community Development Model of the County General Plan and designed to meet the*

C1c-130

C1c-130 Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2.

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<p><i>LEED Neighborhood Development Certification or an equivalent.</i></p> <p>3.) In the few cases where specific GP policies are cited, the evidence for consistency with the policy is in some cases asserted by merely repeating the language of the policy itself. For LU1.2: <i>"the project is not "leap frog development" because it is designed to conform to the Community Development Model, provides necessary services and facilities, and would be designed to meet the LEED Neighborhood Develop Certification or an equivalent.</i> For LU3-1, LU3-2 and LU3-3: <i>"The project likewise provides "a complete neighborhood" to include a neighborhood center within easy walking distance of surrounding residences while providing a mixture of residential land use designations and development regulations that accommodate various building types and styles."</i></p> <p>4.) In a few cases where the SP/GPA proposes amendments to Mobility Element road classifications or acceptable LOS levels, the RDEIR argues that the SP/GPA is not inconsistent with the GP because relaxing the standards makes it consistent. Again, the point here is that consistency is achieved only by amending the General Plan to fit the project.</p> <p>5.) The RDEIR (Section 3.1.4, p 3-56, Land Use Planning, line 4) refers the reader to the Specific Plan, and asserts falsely (p. 3-65) that <i>"the project's conformance with other General Plan policies is detailed in the Specific Plan. Overall the project would be consistent with the General Plan; therefore land use impacts associated with policy inconsistencies would be less than significant."</i></p> <p>6.) There should also be discussion and analysis of the impact of the precedent that would be set by encouraging this project's General Plan busting notion that the Community Development Model is a "Village" puzzle piece that any developer's ambition can drop anywhere in the San Diego County countryside.</p> <p><b>C. The RDEIR glosses over General Plan Goals and Policies and fails to provide evidence of consistency in order to reach its "conclusion" of NO SIGNIFICANT IMPACTS.</b></p> <p><b>LAND USE ELEMENT</b></p> <p><b>LU-1.4 Village Expansion:</b> <i>"Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all the following criteria are met: Public facilities and services can support the expansion without a reduction of services to other County residents, and the expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area"</i></p> <p><b>Comment-INCONSISTENT:</b> If there was an existing or planned Village in western Valley Center, Accretive could try to use this provision, instead of being prohibited by the</p>	<p>C1c-131 The project includes a General Plan Amendment to the Mobility Element to downgrade the segment of West Lilac Road from Running Creek Road to Main Street from a 2.2C to a 2.2F road, addressed in subchapter 1.6 of the FEIR (See also subchapter 2.3, Traffic with respect to West Lilac Road and Road 3). An amendment to Table M-4 would also be required because the reduction of West Lilac Road from a 2.2C to a 2.2F would result in West Lilac Road operating below acceptable levels of service. West Lilac Road is being proposed to be added to Table M-4 and exempt from LOS standards because improvements to General Plan standards of 2.2.c would adversely affect active agricultural operations and mature oak woodland habitat. Additionally, the improvement of West Lilac Road to 2.2C width would require the condemnation of private land and the removal of driveway access to homes on the northern side of West Lilac Road. West Lilac Road would be improved in compliance with the County Public Road Standards, unless road exceptions are granted by the County. The section of West Lilac Road proposed to be downgraded to a 2.2F Mobility Element road will operate at LOS D or better in every scenario except with Road 3 as shown on the current Mobility Element. As noted in the TIS, Section 9.2.3, SANDAG has purchased the 902 acre Rancho Lilac property, through which Road 3 runs for biological open space. Therefore, it would be unlikely that Road 3 would be constructed in this location.</p> <p>C1c-132 This error has been corrected. Please refer to Appendix "W"</p> <p>C1c-133 The commenter broadly questions the project consistency with the General Plan. The FEIR analyzes and concludes the project is wholly consistent with the General Plan. Please refer to Appendix W for a more thorough discussion of this topic.</p> <p>C1c-134 The commenter broadly questions the project consistency with the General Plan. The FEIR analyzes and concludes the project is wholly consistent with the General Plan. Please refer to Appendix W for a more thorough discussion of this topic. The remainder of the comment recites General Plan LU-1.4.</p>
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Leapfrog Development provisions of LU-1.2. However, the only "existing or planned Village" in Valley Center is the Village in the central valley where north and south nodes are separated by a dramatic escarpment and Moosa and Keyes Creeks. This area has existed as a "Village", has been planned for expansion for more than 50 years and was designated a SANDAG Smart Growth Opportunity area with the recent update of the County General Plan. The area is sewerred and has received a large grant from the state of California to expand wastewater facilities. Valley Center Road, which traverses this area and connects to Escondido and Pauma Valley, was improved to Major Road standards only a few years ago in anticipation of expanded development here. The Valley Center Community Planning Group has increased residential densities in this area so that about 25% of the community's growth can be accommodated in the "vibrant, compact Villages" the community has envisioned.

C1c-135 cont.

This provision is a clear companion to and exemplifies the GP support for intensifying development in existing Village areas and its thrust against leapfrog development -- by emphasizing only expansion of an existing Village. The Project also fails to meet the criteria: Its construction would clearly reduce services to all Valley Center residents outside the development by taking away from the economic viability of the existing two Villages, as well as blocking emergency evacuation ability for current residents. As previously pointed out, its urban pattern is totally out of "character and scale" with Valley Center's vision. Nor does a third Village provide "contiguous growth of a Village area." A new Regional Category Village is prohibited in the area of the Proposed Project. This provision would have to be amended to allow this Project, and the RDEIR would have to analyze the environmental effects countywide of such an amendment.

**LU-2.3 Development Densities and Lot Sizes:** "Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community."

**Comment-INCONSISTENT:** This is another demonstration of the interwoven fabric of the GP. Densities and lot sizes reflect community character. Valley Center's community character (once you drop Accretive's fiction that there is no existing community) is primarily rural, exemplifying the Community Development Model at the heart of the GP. Urban densities and lot sizes proposed by this Project are inconsistent with the Semi-Rural land use designations established by the GP and CP for this area.

C1c-136

**LU-2.4 Relationship of Land Uses to Community Character:** "Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles."

**Comment-INCONSISTENT:** This is yet another demonstration of the interwoven fabric of the GP. Requiring projects to comply with the applicable Community Plan is the most effective way to meet the GP Goal LU-2, to maintain the county's rural character. Valley Center's community character (once you drop Accretive's fiction that there is no existing community) is primarily rural, exemplifying the Community Development Model at the heart of the GP. This Project is inconsistent with the Semi-Rural land use designations established by the GP and CP for this area, as well as all the Guiding Principles, as

C1c-137

C1c-135 The General Plan includes two policies that guide growth in Villages. Policy LU-1.4 specifically relates to growth in existing Villages. The county agrees that the project is not an expansion of an existing village and therefore LU-1.4 does not apply. Policy LU-1.2 specifically refers to the development of new Villages. See the Global Response: Project Consistency with General Plan Policy LU-1.2. See also response to comment C11-2 regarding growth issues. The project will provide the necessary infrastructure as required in General Plan policy LU-1.2. Discussion in the FEIR regarding the transportation system network, sewer and schools relating to the project is found at subchapters 2.3, 3.1.7, and 3.1.5 respectively. With respect to the two Villages identified in the County General Plan, see response to comment O3c-3.

The project does not propose to amend any guiding principles, goals, objectives or policies of the San Diego County General Plan but rather the project proposes a project-specific General Plan Amendment only. Since the General Plan Amendment will not amend General Plan principles, goals, objectives or policies, nor would it amend an area other than the project area, therefore it will not necessitate countywide environmental review of the General Plan update adopted August 11, 2011. Please refer to FEIR, Appendix W for a thorough discussion of project consistency with General Plan Land Use policies.

C1c-136 The commenter questions the consistency of the project with Land Use Policy 2.3, raising concerns about community character in terms of densities and lot sizes. This project proposes to amend the General Plan Regional Land Use Map to re-designate the entire project site as a Village, and that is consistent with the Community Development Model. Land use densities will be assigned based upon the Village designation. In addition the project proposes to modify the text of both community plans the Valley Center Community Plan and the Bonsall Community Plan by adding Lilac Hills Ranch as an additional Village.

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	<p>C1c-136 (cont.)</p> <p>The project has been designed to be consistent with relevant community plan policies by incorporating the design principles set forth in both in both of the Valley Center Community Plan and the Bonsall Community Plancommunity plans. For example, the Valley Center Community Plan requires “Rural Character” to be maintained in future developments by prohibiting monotonous tract developments and requiring site design that is consistent with the rural community character. Additionally, in the project’s Specific Plan Chapter 3, design guidelines are established that will, create transitions from low-density residential and agricultural uses, to the denser uses within the Village.</p> <p>Inherently, the project features the most intense uses, single-family attached units, in the center of the development and away from the neighboring land uses. Project development along West Lilac Road, east of the western entrance, would consist of single-family detached homes on one-half acre lots (or 50-foot buffer). The wider spacing between these homes combined with the landscaping and multi-use trail on the south side of West Lilac Road provide a gradual transition from the project to existing nearby homes and users of West Lilac Road. The project also incorporates various design features to reduce visual effects along the project perimeter. These include the use of wider lots, and grade separations or landscape buffers in areas where there are existing homes. Along the west side of the project, the large riparian woodland would be preserved, providing separation from the project and existing homes. In areas adjacent to existing agriculture, a 50 foot wide buffer planted with trees will provide a transition from the project to the existing uses.</p> <p>C1c-137 Refer to comment C1c-136 above. Please also refer to Appendix W.</p>
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<p>previously pointed out.</p> <p><b>LU-5.3 Rural Land Preservation:</b> <i>"Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations."</i></p> <p><b>Comment-INCONSISTENT:</b> If this Project proposed development consistent with its existing Land Use Designations, it would still be required by this provision to "preserve," not destroy. The proposed project destroys even more open space, agricultural lands, wildlife habitat and corridors, and watersheds than it would be allowed with consistent development, by its urbanized design, density, and size, as previously pointed out. Urban densities and lot sizes proposed by this Project are inconsistent with the Semi-Rural land use designations established by the GP and CP for this area.</p> <p><b>LU-6.1 - Environmental Sustainability:</b> <i>"Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment."</i></p> <p><b>Comment- INCONSISTENT</b></p> <p>There have been thirteen (13) Group 1 animal 'species of concern' observed on the Accretive project site. They include lizards, snakes, raptors, small mammals, large mammals and passerine birds. Most of the wildlife surveys conducted focused on the proposed open space areas, brushing over the considerable land area devoted to agriculture as being disturbed. Of the 608-acres on the Project site, 504-acres will be graded, cut and filled, for the construction of the Project.</p> <p>The RDEIR acknowledges the significant impact to these 13 species [and presumably to other species numerous enough not to be of concern], and particularly the raptors and cathartids [white-tailed kite, Cooper's hawk, turkey vulture] and the loss of 504-acres of foraging area [including agricultural areas]. The RDEIR dismisses this loss with 81.7-acres of on- and off-site mitigation area [presumably already populated by members of these species with whom the Project's individuals will compete], a substantial differential from the complete 608-acres. Many of the individuals of the 13 species will be killed during construction operations, particularly the smaller, less mobile animals. Others will be forced into new territory. Of the larger animals, they will be forced to compete with others of their species in substantially less area.</p> <p>So, the Project is not protecting sensitive natural resources except those that it is prohibited from completely destroying [largely, riparian wetlands]. Such practices of building urban density projects in rural and even agricultural areas will ultimately decimate the natural environment.</p> <p><b>LU-6.4 Sustainable Subdivision Design:</b> <i>"Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and when appropriate, provide public amenities. [See applicable community plan for possible relevant policies.]"</i></p> <p><b>Comment-INCONSISTENT:</b> The Accretive Project instead proposes the minimum required open space, eliminates existing and imperils adjacent agricultural operations,</p>	<p>C1c-137 cont.</p> <p>C1c-138</p> <p>C1c-139</p> <p>C1c-140</p> <p>C1c-138 The commenter questions the consistency of the project with Land Use Policy 5.3, raising concerns about preservation and project density and sizes. Policy 5.3 is not applicable to the project because the policy is concerned with permitting development under the Rural and Semi-Rural Land Use Designations. The project is requesting a General Plan Amendment approval which would result in a change in Land Use Designation from Semi-Rural to Village.</p> <p>C1c-139 The commenter questions the consistency of the project with Land Use Policy 6.1, raising concerns about potential impacts to sensitive natural resources. The project will protect 104.1 acres of sensitive biological resources (one-sixth of the entire project site.) Approximately 35-acres of sensitive wetland areas will be preserved and maintained in perpetuity along the western boundary of the project and within the development. The few areas of disturbed wetlands will be restored, enhanced and appropriate mitigations provided. Mitigation for impacts to upland habitats will be located in areas that contribute significant resources to an integrated preserve system. Implementation of the project will ensure the conservation of the significant sensitive resources on-site and the implementation of this policy. See also FEIR, subchapter 2.5, Biology; FEIR, Table S-1, Biological Mitigation Measures, M-BIO-2 (Resource Management Plan for riparian and sensitive natural communities); M-BIO-3 (wetland mitigation per County regulations. Thus the project is consistent with Land Use Policy 6.1. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with General Plan Land Use policies.</p> <p>C1c-140 The commenter questions the consistency of the project with Land Use Policy 6.4, raising concerns about open space, fire safety, and LEED-ND equivalency. Regarding open space, the project will protect 104.1 acres of sensitive biological resources. Moreover, approximately 35-acres of sensitive wetland areas will be preserved and maintained in perpetuity along the western boundary of the project. In addition, the project incorporates 42.2 acres of agricultural buffers and agricultural open space as part of the project design.</p> <p>Regarding fire safety, the project Fire Protection Plan (FEIR, Technical Appendix J) evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard. The wildfire threat will be</p>
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and substantially worsens fire safety and defensibility, as shown by the Deer Springs Fire District comments. Instead of reducing impervious footprints, it proposes 1746 residential units etc., covering 504 of its 608 acres. Trumpeting "sustainable" development practices, it completely ignores the fundamental requirements of LEED ND to have a Smart Location and preserve Agriculture. The public amenities necessary to support their proposed city in the county, parks, schools, sewers, are all couched in "conceptual" terms, with built-in defaults to convert acres to still more additional residences. If, for example, the school or park sites (proposed without school and park amenities) are not accepted, the SP provides for their easy conversion to residential uses. This provision would have to be amended to allow this Project, and the RDEIR would have to analyze the environmental effects countywide of such an amendment.

C1c-140  
cont.

**LU-6.6 Integration of Natural Features Into Project Design:** "Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources."  
**Comment:** This requirement is again honored only in its violation by this Project. Over four million cubic yards of grading to destroy natural features and create "manufactured" hills suitable only for urbanized residential construction. This provision would require amendment to approve this project. The RDEIR would have to analyze the environmental effects countywide of such an amendment.

C1c-141

**LU-6.6 Integration of Natural Features into Project Design:** "Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources."  
**Comment-INCONSISTENT**  
With the exception of the riparian woodlands/wetlands that must be set aside, the 4 million cubic yards of blasting and grading will obliterate any other natural features of the Project site. Once completed, the Project will resemble any urban center in the county, with little of the natural landscape remaining. Native vegetation habitats will be destroyed and mitigated off-site. Animal populations will be destroyed or shoved to the remaining riparian set-asides or off-site. Avoidance of sensitive environmental resources is minimal; destruction of this area's natural features and mitigation elsewhere are the preferred approaches for this project, obviously inconsistent with Valley Center's objectives.

C1c-142

**LU-6.7 Open Space Network:** "Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities."  
**Comment-INCONSISTENT**  
This Project has reserved minimal open space along wetlands and riparian areas that are particularly protected by federal, state, and county laws. The continuity of the open space will be broken by multiple road crossings with culverts mostly inadequately sized for safe wildlife passage. Intensity urban development will dominate the presently rural agricultural and natural vistas with rows of dense urban rooftops. The open spaces being set aside are not coordinated with the draft MSCP/PAMA and will not connect with any similar open space uses off-site. While the Project is within the draft MSCP

C1c-143

C1c-140 (cont.)

mitigated to less than significant levels by the incorporation of following Project design features, FMZs; the use of ignition resistant building materials; fire and building code guidance for the protection of non-residential structures; the provision of fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. In addition, Mitigation measure M-HZ-1 provides alternative measures to achieve the same level of protection from potential wildfires, when the 100 foot FMZ cannot be met. Please refer to the Global Response: Fire and Medical Services. Regarding LEED-ND equivalency, please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2, which includes an extensive discussion about project consistency with LEED-ND including the project. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with this and other General Plan Land Use policies.

C1c-141

The commenter questions the consistency of the project with Land Use Policy 6.6, raising concerns about grading. Grading for the project maintains the overall general contour of the property, requiring 2,300 cubic yards of grading per home, which would require a minor grading permit on an individual lot basis). This is consistent with projects of this size. 99.7 percent of all steep slopes are retained in open space and private roads are used that reduce grading by reducing the design speeds and overall development foot print, and following the contours of the property. All graded areas will be landscaped with drought tolerant plantings that are compatible with the surrounding environment as well as the theme of the project. The Specific Plan, Ch. III, Section G, includes guidelines for grading all areas of the project beginning on page III-51. No more than 50 acres of the project site will be actively graded at any one time. See FEIR, Table 1-4 for grading phasing. The FEIR includes conceptual grading plans showing how the grading would adhere to existing landforms and contours. Thus the project is consistent with Land Use Policy 6.6. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with General Plan Land Use policies. As stated in response to comment C1c-135 the project will

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	<p>C1c-141 (cont.) not require amendment of any General Plan policies and will therefore the project will not precipitate additional environmental review. Thus the project is consistent with Land Use Policy 6.6. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with General Plan Land Use policies.</p> <p>C1c-142 The commenter questions the consistency of the project with Land Use Policy 6.6, raising concerns about grading, sensitive environmental resources, integration with natural features, and consistency with the Valley Center Community Plan objectives. For concerns about grading please refer to response to comments C1c-16, C1c-30, and C1c-41 . For concerns about sensitive environmental resources, please refer to responses to comment C1c-139 and C1c-140. For concerns about integration of the project with natural features, most recognizable and sensitive natural feature on the property are the drainages with their mature oak woodlands, almost all of which have been integrated into the preserved open space system of the project. Where disturbed, the mature oak woodlands have been enhanced and restored. Over 75 percent of the property is already disturbed. Of the 146 acres that is not disturbed, 104.1 acres, or one-sixth of the site, will be conserved in permanent open space. For concerns about consistency with the Valley Center Community Plan objectives, please see response to comment C1c-136, for example, addressing community character. Please refer to the FEIR, Appendix W, for a thorough discussion of project consistency with General Plan Land Use Policy 6.6. For the foregoing reasons, the project is therefore consistent with Land Use Policy 6.6.</p> <p>C1c-143 The commenter questions the consistency of the project with Land Use Policy 6.7, raising concerns about open space and the project relationship to the MSCP. For concerns about open space please refer to response to comments C1c-139 and 140. Regarding the project relationship to the MSCP, the project is not located within any proposed regional preserve system. However, the project contains a significant drainage along the western boundary of the property that will be preserved as open space. This area is adjacent to and drains into the proposed preserve envisioned in the Draft North County Multiple Species Conservation Program (NC MSCP).</p>
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	<p>C1c-143 (cont.)</p> <p>There are no wildlife corridors or core areas identified on the project site. Local movement is maintained through preservation of major drainage areas through the property in both north-south and east-west directions. Impacts to upland habitat will be mitigated offsite by providing land located within the proposed PAMA contributing the long-term sustainability of upland vegetation types including coastal sage scrub and chaparral. Landscaping within the project will not use invasive species as provided in the conceptual landscape plan and the Specific Plan. In keeping with the project objectives of a consolidated development footprint, Lilac Hills Ranch preserves the more sensitive wetlands while developing less sensitive upland areas where no significant populations of native species are located. Conservation of upland habitat offsite in areas conceptually planned as a regional preserve will ensure that the natural environment is preserved in an interconnected preserve system while ensuring that development is done in a sustainable, consolidated manner, minimizing habitat fragmentation. Lilac Hills Ranch will conserve 90-95 percent of on-site wetlands and restore degraded habitat in accordance with the Lilac Hills Ranch Resource Management Plan. Appropriate buffers are included in the project design. Thus the project is consistent with Land Use Policy 6.7. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with General Plan Land Use policies.</p>
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<p>boundary, it is not part of a PAMA.</p> <p><b>LU-6.9 Development of Conformance with Topography:</b> <i>"Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying storm water to the maximum extent possible."</i></p> <p><b>Comment-INCONSISTENT:</b> Could the writers of the GP and the Board of Supervisors with their approval not make more clear that the destruction of the land proposed by this Project's over four million cubic yards of grading to destroy natural features is prohibited? The Project glorifies, not limits grading. The Project proposes to obliterate, not "not significantly alter," the dominant physical characteristics of the site. This provision would require amendment to approve this project. The RDEIR would have to analyze the environmental effects countywide of such an amendment.</p> <p><b>LU-9.6 Town Center Uses:</b> <i>"Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Village or Rural Villages at transportation nodes...."</i></p> <p><b>Comment-INCONSISTENT:</b> As previously pointed out in the comments on the Project's total failure to meet the LEED ND Smart Location Requirement, it is not designed as a Transit Corridor or Route with Adequate Transit Service. It is not a "transportation node." This provision would require amendment to approve this project. The RDEIR would have to analyze the environmental effects countywide of such an amendment.</p> <p><b>LU-09.11 Integration of Natural Features into Villages:</b> <i>"Require the protection and integration of natural features, such as unique topography or streambeds, into Village projects."</i></p> <p><b>Comment-INCONSISTENT:</b> This provision was included in the GP because Valley Center required the developers of the north Village to do exactly that, making the streambed there an open space centerpiece of their design in their cooperative plans for their adjacent projects. Accretive instead proposes to obliterate the natural topography for their entire site, grading over four million cubic yards of genuinely natural features into manufactured hills. This policy would require amendment to approve this project. The RDEIR would have to analyze the environmental countywide effects of such an amendment.</p> <p><b>LU-10.2 Development- Environmental Resource Relationship:</b> <i>"Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas."</i></p> <p><b>Comment- INCONSISTENT:</b> This Project does not respect nor significantly conserve the unique natural flora and fauna of the site, nor does it conserve the rural character of the site. This Project will destroy a mosaic of natural vegetation habitats that are interspersed among agricultural uses. The current mix of natural habitats, orchards and row crops provides distinctive opportunities for a variety of faunal species [several of them sensitive], benefits the local hydrology by restraining and filtering run-off, and presents a pastoral view-shed that is historically characteristic of north San Diego</p>	<p>C1c-143 cont.</p> <p>C1c-144</p> <p>C1c-145</p> <p>C1c-146</p> <p>C1c-147</p> <p>C1c-144 The commenter questions the consistency of the project with Land Use Policy 6.9, raising concerns about grading, natural features, and amending the General Plan at large. Concerning grading and amending the General Plan at large please refer to response to comment C1c-141 and for concerns about natural features, please refer to response to comment C1c-142. Moreover, grading in all phases, including off-site improvements would comply with the Landform Grading Guidelines contained in the Specific Plan which will include the blending and rounding of slopes, roadways, and pads to reflect the existing surrounding contours by undulating slopes, replicating the natural terrain. The Specific Plan text includes a number of single-family development templates that step down the hillsides. All earthwork activities will occur only within the project boundaries as required. Runoff is directed to existing drainages through appropriate mechanisms as discussed in the FEIR, Chapter 3.0 and in Appendix U-1,2,3 relating to hydrology and stormwater management. Thus the project is consistent with Land Use Policy 6.9. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with General Plan Land Use policies.</p> <p>C1c-145 The commenter questions the consistency of the project with Land Use Policy 9.6, raising concerns about LEED-ND equivalency and project transit services. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2, which includes an extensive analysis of LEED-ND equivalency as applied to the project. For example, the project includes an Integrated Transportation Management Plan that ensures project linkage to the regional transit system through implementation of an interim plan and through long-term coordination with regional transportation agencies. A transportation node is a stop in a transportation system (ie: bus stop). The Town Center is located at the main intersection of Main Street and Lilac Hills Ranch Road in the north-central portion of the property as called for by this policy. This location would support a transportation node because it is easily accessible and is where a transit stop will be included in the future when the NCTD bus service is extended to this area. Neighborhood Centers are also located with other civic and commercial uses to enhance viability and ensure that they can be easily reached on foot or bike. Thus the project is consistent with Land Use Policy 9.6. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with General Plan Land Use policies.</p>
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	<p>C1c-146 The commenter questions the consistency of the project with Land Use Policy 9.11, raising concerns about grading and amending the General Plan at large. Concerning grading and amending the General Plan at large please refer to response to comment C1c-141. Moreover, the natural drainage system is retained within the design of Lilac Hills Ranch. Habitat restoration will ensure that infiltration into groundwater is maximized. Several detention basins are incorporated throughout the project to ensure that most stormwater runoff percolates back into the groundwater that underlies the property. The project will also encourage builders to achieve hydrologic invisibility through a combination of methods including architectural features, rain harvesting and use of loosened soil zones to maximize filtration. The most recognizable and sensitive natural feature on the property are the drainages with their mature oak woodlands, almost all of which have been integrated into the preserved open space system of the project. Where disturbed, the mature oak woodlands have been enhanced and restored. Over 75 percent of the property is already disturbed. Of the 146 acres that is not disturbed, 104.1 acres will be conserved in permanent open space. Thus the project is consistent with Land Use Policy 9.11. Please see response to Comment C1c-142 and refer to FEIR, Appendix W, for a thorough discussion of project consistency with General Plan Land Use Element policies.</p> <p>C1c-147 The commenter questions the consistency of the project with Land Use Policy 10.2, raising concerns about sensitive natural resources, community character, and hydromodification of the site. Land Use Policy 10.2 is not applicable to the project because the project is requesting a General Plan Amendment approval of which would result in a change in Land Use Designation from Semi-Rural to Village. Please refer to responses to comments C1c-139 and C1c-140 concern sensitive natural resources. Please refer to response to comment C1c-29 for a discussion of hydromodification of the site. Thus the project is not inconsistent with Land Use Policy 10.2. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with General Plan Land Use Element policies.</p>
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County. The Project will create severe hydrology issues with the addition of hundreds of acres of impermeable road and rooftop surfaces that will cause excessive run-off. Run-off that would otherwise enter the water table and help to stabilize levels vital to the riparian habitats down-slope, will be impounded and/or dispersed on the surface. The Project will be composed of dense urban village configurations that are completely at odds with rural and semi-rural areas and the natural habitats and populations they support.

C1c-147  
cont.

**MOBILITY ELEMENT**

**M-12.9 Environmental and Agricultural Resources:** *“Site and design specific trail segments to minimize impacts to sensitive environmental resources, ecological system and wildlife linkages and corridors and agricultural lands. Within the MSCP preserves, conform siting and use of trails to County MSCP Plans and MSCP resource management plans.”*

**COMMENT-INCONSISTENT**

Presently, the trails proposed for the Project will intrude into the buffer and LBZ areas along side the designated biological open spaces as well as the open spaces themselves. The fences proposed to separate and protect segments of the open spaces from the edge effects created by the Project [human intrusions, domesticated cats and dogs, invasive plant species, etc.] will also create barriers to the movement of wildlife. Instead of treating these biological open spaces as retreats and corridors for the movement of wildlife, the trails proposed would turn them into parks for humans and their pets. This will have an adverse effect on the value of these open spaces for wildlife.

C1c-148

**CONSERVATION AND OPEN SPACE ELEMENT**

**GOAL COS-2 Sustainability of the Natural Environment:** *“Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development.”*

**COMMENT-INCONSISTENT:**

The Project will eliminate 504-acres of mixed native and agricultural lands that provide foraging area for numerous animal species identified in the biological resources report. This represents an incremental loss of habitat and ultimately a loss of local wildlife populations within the county and the Project site. The removal of the project site from the inventory of rural lands to create an urban village will constitute an irreversible loss and opposes the intent of sustainable development. It will likely result in growth inducing pressure on surrounding properties as the rural and natural characteristics of the land disappear.

C1c-149

**COS-2.1 Protection, Restoration and Enhancement:** *“Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important Natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village*

C1c-150

C1c-148 The commenter questions the consistency of the project with Mobility Element Policy 12.9, raising concerns about using fencing, for example, to protect biological resource preserve from trail and human pet activities, also known as edge effects. As discussed in the Specific Plan in Subchapter III.J.3, at p. III-55 there will be maintenance plans reviewed and approved by state and federal wildlife agencies ensuring the long term protection of the habitat and wetland values of the 104.1 acre biological preserve in compliance with state and federal wildlife and habitat protection laws. Fencing to protect edge effects but still allow wildlife movement is thoroughly discussed in FEIR at Subchapter 2.5.2.2, specifically at pages 2.5-22, 2.5-24, 2.5-41. RIER Subchapter 2.5.5 also discusses a range of mitigation measures to protect biological resources. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with General Plan Mobility Element policies, including policy 12.9.

C1c-149 The commenter questions the consistency of the project with Conservation and Open Space Goal 2, raising concerns about biological and agricultural resources and growth inducement. Regarding biological resource protection see responses to comments C1c-151 and c1c-152, and FEIR subchapter 2.5. Moreover, the site design of the project places development in the less sensitive upland areas where no significant populations of native species have been located. The more sensitive wetland habitats are preserved in existing drainages onsite and because this site design strategy places a significant complex of wetlands immediately adjacent to the proposed preserve envisioned in the Draft North County Multiple Species Conservation Program (NC MSCP) the loss of the most sensitive natural habitat on the project site is minimized. See FEIR, subchapter 2.5 Biology; Specific Plan, Section II.C. Regarding agriculture, the project includes community gardens, orchards, and would encourage farmers markets in the Town Center. Regarding growth inducement, subchapter 1.8 in the FEIR was revised. It thoroughly analyzes various factors, including project density, additional housing, roadway construction, public facilities, fire and emergency services, schools, and water and wastewater services, and concludes the project could be growth inducing due to the intensification of uses on-site, lower fire response times to the vicinity, and expansion of water and sewer infrastructure. However potential impacts are too speculative for evaluation in this FEIR because the specific nature design and timing of future projects is unknown at this time.

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	<p>C1c-149 (cont.) Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with COS Goal 2 and other Conservation and Open Space Element policies.</p> <p>Finally, the commenter correctly observes, as is discussed in the FEIR in subchapter 2.9, that project construction and development over the 10 to 12 year development phase will cause irreversible changes to the project site.</p> <p>C1c-150 The commenter questions the consistency of the project with Conservation and Open Space Policies 2.1 raising concerns about growth inducing impacts to the MSCP. Regarding growth inducement, the FEIR in subchapter 1.8 thoroughly analyzes various factors, including project density, additional housing, roadway construction, public facilities, fire and emergency services, schools, and water and wastewater services, and concludes the project could be growth inducing due to the intensification of uses on-site, lower fire response times to the vicinity, and expansion of water and sewer infrastructure. However potential impacts are too speculative for evaluation in this FEIR because the specific nature design and timing of future projects is unknown at this time. Moreover, the project places development in the less sensitive upland areas where no significant populations of native species have been located. The more sensitive wetland habitats are preserved in existing drainages onsite and because this site design places a significant complex of wetlands immediately adjacent to the proposed preserve (PAMA) envisioned in the Draft North County Multiple Species Conservation Program (NC MSCP) the loss of the most sensitive natural habitat on the project site is minimized. See FEIR, subchapter 2.5 Biology; Specific Plan, Section II.C. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with COS Policy 2.1 and other Conservation and Open Space Element policies.</p>
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<p><i>lands where appropriate."</i>  <b>COMMENT-INCONSISTENT:</b>  <b>This Project proposes to set a devastating precedent for the intrusion of urban development into rural lands.</b> While the Project site is within the MSCP boundary, it is not a part of a PAMA. The site is presently designated for estate housing and agricultural uses but would be modified to allow urban village densities, which would diminish rural and natural lands within the MSCP area and likely induce similar densities on surrounding properties. Such creeping higher densities within the MSCP would ultimately impact the neighboring PAMA areas through edge effects and compromise value of those native habitats and the intent of the MSCP/PAMA program.</p> <p><b>COS- 2.2 Habitat Protection Through Site Design:</b> <i>"Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design."</i>  <b>COMMENT- INCONSISTENT</b>          Like GP Goal COS 2.2, the prerequisite of the LEED ND standard also is to place development in smart growth locations, such as urban infill and brown fields or adjacent to urban areas where there is easy access to infrastructure and job centers. This Project fails to meet those goals and, consequently, it will cause significant destruction of biological assets in an area that should be spared under the criteria for a smart growth location.</p> <p><b>COS- 3.1 Wetland Protection:</b> <i>"Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement."</i>  <b>COMMENT-INCONSISTENT</b>          The project is preserving and restoring the on-site wetlands, habitats that are in shortest supply regionally, but the upland vegetation components will be subjected to severe grading, and fuel modification to accommodate the development. Rather than being enhanced, the upland areas will be shaved of value for both flora and fauna.</p> <p><b>COS- 3.2 Minimize Impacts of Development:</b> <i>"Require development projects to: Mitigate any unavoidable losses of wetlands, including its habitat functions and values; Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydro modification, land and vegetation clearing, and the introduction of invasive species."</i>  <b>Comment -INCONSISTENT</b>          The Project proposes to mitigate the loss of wetlands caused by new road crossings by restoring or creating wetland on-site adjacent to existing wetlands. The value of mitigating wetland losses on-site is questionable given the edge effects caused by human intrusion, domestic cats and dogs, invasive plant species, trash, etc. that cause mitigation efforts to be diminished. Exacerbating the edge effects is the plan to establish trails within and adjacent to the biological open spaces.</p> <p>Further, the Project's storm water run-off from the massive acreage of impermeable surfaces to be built is likely to impact the water regime within the biological open</p>	<p><b>C1c-151</b></p> <p>The commenter questions the consistency of the project with Conservation and Open Space Policy 2.2 (COS-2.2) raising concerns about project consistency with LEED-ND with respect to biological resources protection. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic.</p> <p><b>C1c-152</b></p> <p>For example the project will permanently protect and enhance 104.1 acres or one-sixth of the biological and wetland resources on the site. Moreover, the project Biological Open Space plan assures the permanent conservation of wetlands and associated riparian and upland habitats, the restoration of degraded wetland habitat, and the provision of opportunities for wetland enhancement, in accordance with an approved and funded Resource Management Plan that meets rigorous wetland conservation and mitigation criteria required by local, state, and federal natural resource agencies. For example, the County RPO limits impacts wetlands, wetland buffers, and sensitive habitat lands and requires a wetland buffer where development is adjacent to wetland areas. According to the Biological Resource Report, current wetland buffers, as contained within the designated limits of the proposed biological open space areas are a minimum of 50 feet wide for the preserved wetlands, with some wetland buffer widths exceeding 100 feet for limited distances. The project, in total, will mitigate for all impacts to wetlands and associated riparian and upland areas, onsite and offsite, through the following mitigation: coast live oak woodland (preserve 3.3 acres on-site; purchase 1.2 acres off-site); coastal sage scrub (preserve 2.9 acres on-site; purchase 39.4 acres off-site); coastal/valley freshwater marsh (preserve 0.5 acre on-site; create 0.3 acre off-site); southern coast live oak riparian woodland (preserve 22.8 acres on-site; create/purchase 4.8 acres off-site); southern mixed chaparral (preserve 27.1 acres on-site; purchase 26.9 acres off-site); southern willow riparian woodland (preserve 4.2 acres on-site; create/purchase 1.5 acres off-site); southern willow scrub (preserve 5.8 acres on-site; create/purchase 1.8 acres off-site); mule fat scrub (create/purchase 0.3 acre off-site), open water/freshwater wetland (create/purchase 1.5 acres off-site); and disturbed wetland (preserve 0.3 acre on-site; create/purchase 0.3 acre off-site). In addition, the project will create 6.0 acres of wetland and enhance 12.0 acres of existing disturbed wetland resources on-site to help offset a portion of the creation/purchase of wetland habitat mitigation off-site.</p>
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	<p>C1c-151 and C1c-152 (cont.)</p> <p>The project is required to monitor and maintain the on-site and off-site open space in accordance with the County's Resource Protection Ordinance. Conceptual Resource Management Plans have been prepared that prescribes the protection and maintenance of wetland areas and associated riparian and upland habitats being preserved on the site.</p> <p>See FEIR, Ch. 2.5, Biological Resource Report, Attachments 15 (Wetlands) and 16 (Biological Open Space). These plans require, among other measures, the removal of invasive species and fencing and signage to prevent site disturbance and degradation. As stated, the final Resource Management Plan must be reviewed and approved by local, state and federal resource agencies and meet all sensitive habitat and wetland regulatory standards including no net loss of habitat functions and values. Therefore the project would be consistent with this goal. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with Conservation and Open Space Element policies.</p> <p>C1c-153 The commenter questions the consistency of the project with Conservation and Open Space Policies 3.2 raising concerns about edge effects and stormwater impacts to wetland protection areas. Concerning protection of biological resource area protection from edge effects, please refer to response to comment C1c-148. Regarding stormwater management, the FEIR at Subchapter 2.7 discusses that the project would include on-site drainage facilities, including water quality treatment BMPs and three hydromodification basins (one per existing drainage basin), to protect against sedimentation and erosion resulting from storm water runoff. The project's impermeable surfaces will not have an impact on the open space in terms of stormwater runoff negatively effecting the riparian area, as disclosed in the FEIR analysis that is supported by Stormwater Management Plans, Drainage Studies, and a Hydromodification Management Plan in Technical Appendices U-1, U-2, and U-3, respectively. Please refer to FEIR, Appendix W, for a thorough discussion of project consistency with COS Policy 2.1 and other Conservation and Open Space Element policies.</p>
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spaces. Adding too much or, conversely, removing too much water from the water table can have adverse effects on the survivability of the riparian habitat.

C1c-153  
cont.

**HOUSING ELEMENT**

**H-1.3 Housing near Public Services.** *Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.*

**H-1.4 Special Needs Housing near Complementary Uses.** *Encourage the location of housing targeted to special needs groups, in close proximity to complementary commercial and institutional uses and services.*

**H-1.8 Variety of Lot Sizes in Large-Scale Residential Developments.** *Promote large - scale residential development in Semi - Rural that include a range of lot sizes to improve housing choice.*

**COMMENT:** The project's General Plan Consistency Analysis Matrix should include the above three Housing Element policies. The project is not consistent with Policy 1.3 under the adopted General Plan because it does not meet any of the listed criteria. Even if the proposed GPA is adopted, the project is not served by a transportation network that includes mass transit or public transportation choices. The project is isolated and is not near any job center. The town center commercial offerings may never materialize and certainly won't offer the income necessary to afford a home in a project as expensive to build as Lilac Hills Ranch. Public services and infrastructure may become available but they are not there now – the opposite of the "smart" growth concepts embraced by the County's General Plan update effort.

C1c-154

Policy 1.4 is applicable to the project's proposed senior housing and assisted living center. Neither are in close proximity to complementary commercial and institutional uses and services. The RDEIR does not discuss the proximity of medical services, clinics and hospitals. Also refer to the comment for Policy H-1.5 below.

Policy 1.8 not only applies to the Specific Plan but to each phase and underlying development project. The County's Land Use Element Policy LU 3-2 defines large scale development as a project that proposes construction of more than 200 dwelling units. Phase 1 proposes 352 units on 121.5 acres. This is 2.9 dwelling units per gross acre, the density assigned by the proposed GPA to this area. The Tentative Map shows very minor lot size differences among the 352 units. This practice is not consistent with the intent of Policy 1.8 which encourages a range of lot sizes to add diverse opportunities for home ownership in the community.

C1c-155

**H-1.5 Senior and Affordable Housing near Shopping and Services.** *Provide opportunities for senior housing and affordable housing development within town centers, transit nodes, and other areas that offer access to shopping and services.*

C1c-154 The commenter questions the consistency of the project with Housing Element Policies H-1.3, H-1.4, and H-1.8. With regard to Housing Element Policy 1.3, the project is consistent with General Plan Policy LU-1.2 where housing will be located within close proximity to the town center, providing job opportunities, public services and infrastructure. In addition, the project will provide a site for a regional transit stop, as described in the Global Response: Project Consistency with General Plan Policy LU-1.2. With regards to Housing Element Policies 1.4 and 1.8 the project includes a wide mix of housing types, including 1,000 square foot units, work/live units, and other forms of housing that support housing for different ages and incomes. The project also includes special senior housing, group facilities, and a senior center. Please refer to FEIR, Appendix W, for a thorough discussion of consistency with project-applicable Housing Element policies.

C1c-155 The commenter questions the consistency of the project with Housing Element Policy H-1.8. The Lilac Hills Specific Plan includes nearly 26 percent of its residential units within a Senior Neighborhood dedicated to providing senior citizen housing with individual homes for seniors and necessary facilities and amenities including a senior community center, assisted and communal living properties within a private gated active adult community are included in the project. As shown in FEIR Figure 1-4, a commercial-mixed use area is located within the Senior Neighborhood that would be dedicated to the needs of the residents. Thus the project is consistent with Housing Element Policy H-1.8. Please refer to FEIR, Appendix W, for a thorough discussion of consistency with project-applicable Housing Element policies. In response to the commenter's concern about senior being able to walk or bike to community amenities please refer to response to comment C1c-20 for a thorough discussion of project walkability with respect to its residents, including the senior community.

<p><b>Comment:</b> The General Plan Consistency Analysis Matrix finds the project consistent with this policy. Clearly, the location of the senior housing is not consistent with this policy under the adopted General Plan. Even if the proposed GPA is adopted, this policy requires senior housing to be located in areas that offer senior residents the convenience to meet their daily needs without resorting to travel by car or a long walk. That is not the case here. The mixed-use town center is not convenient and the closest neighborhood center is too small to meet daily needs. In addition, senior residents and especially those in assisted living will need a medical facility nearby. The RDEIR analysis should discuss where the closest medical facilities are located and how long it would take to transport someone there.</p> <p><b>H-1.9 Affordable Housing Through General Plan Amendments:</b> <i>"Require developers to provide an affordable housing component when requesting a General Plan amendment for a large-scale residential project when this is legally permissible."</i>  <b>Comment-INCONSISTENT:</b> This policy is not included in the project's general plan consistency analysis. There appears to be NO assurance anywhere in the SP or RDEIR that, in accord with Affordable Housing or Goal H-1 and Policy H-1.9, that the "senior housing" promised will ever be built. In addition, the project does not commit to any assurance that this senior housing will be affordable, the point of this policy.</p> <p>The County's Land Use Element Policy LU 3-2 defines large scale development as greater than 200 dwelling units, so even if there are no firm plans for anything beyond the Phase I 354 homes, the County would still considers this to be a "large-scale residential project." In the absence of further guidance from the County regarding compliance with this policy, the requirements for the production of affordable housing found in the County's Density Bonus Ordinance should be applied. This ordinance requires that the affordable housing be built concurrently and in proportion to the market-rate units.</p> <p>To approve this project, the policy would require an amendment. The RDEIR would have to analyze the environmental effects countywide of such an amendment. Alternatively, the RDEIR should contain some discussion and analysis of why this provision is not applicable or is otherwise satisfied.</p> <p><b>H-2.1 Development That Respects Community Character:</b> <i>"Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element. [See applicable community plan for possible relevant policies.]"</i>  <b>Comment:</b> This is yet another demonstration of the interwoven fabric of the GP. Requiring projects "not to degrade or detract from the character of surrounding development consistent with the Land Use Element" explicitly ties housing back to the bedrock Land Use Element, the Community Development Model, and the LEED ND Smart Location Requirement. Unless you resort to Accretive's fiction that there is no existing community (and by extension, no existing "community character" to the western Valley Center neighborhood) plopping an urban project the size of Del Mar into a rural, predominantly agricultural area designated for Semi-Rural uses, would be in significant</p>	<p>C1c-155 cont.</p> <p>C1c-156</p> <p>C1c-157</p> <p>C1c-156 The commenter questions the consistency of the project with Housing Element Policies regarding affordable housing. Specifically, the project has been designed to ensure that the full number of homes will be constructed. As shown on Figure 15 of the Specific Plan, certain areas within or adjacent to the Town Center and central Neighborhood Center will provide opportunities for housing at densities of 25 units per acre. The County does not have an ordinance requiring developers to provide affordable housing. Please refer to FEIR, Appendix W, for a thorough discussion of consistency with project-applicable Housing Element policies.</p> <p>C1c-157 The commenter questions the consistency of the project with Housing Element Policy H-2.1 raising concerns about project consistency with the General Plan, the Valley Center Community Plan, and specific criteria of General Plan Land Use Policy LU-1.2. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W for a thorough discussion on these topics. Moreover, Lilac Hills Ranch will expand the variety of housing opportunities available to residents of the unincorporated area in a well designed Village and will be constructed in accordance with a comprehensive set of design guidelines. This will not degrade or detract from the character of homes in the area. Such homes range from expensive custom homes on large lots to older, small, modest residential structures modeled on homes built in past decades. Open space along project boundaries will provide a buffer in other areas. Please refer to FEIR, Appendix W, for a thorough discussion of consistency with project-applicable Housing Element policies. See also response to comment C1c-158.</p>
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contradiction to the "character of surrounding development." Once again the GP requires developers to comply with the applicable Community Plan. That is the most effective way to meet the GP Goal LU-2, to maintain the county's rural character. This Project is inconsistent with the Semi-Rural land use designations established by the GP and CP for this area, as well as all the Guiding Principles, as previously pointed out.

C1c-157  
cont.

V. Community Plan Inconsistencies

A. Community Character Goals

Preserve and enhance the rural character by "maintaining a pattern of land use consistent with the following regional categories: **Village**. Enhance the rural village character of valley center's north and south villages... **Semi-Rural**: Preserve and maintain the overall rural and agricultural character of the semi-rural areas...."

Policy 1 "Require that future projects are consistent with the goals, policies, and recommendations contained in the Valley Center Community Plan.

Policy 2. Prohibit monotonous tract developments

**Comment:** The SP and RDEIR cannot avoid the clear violation of these provisions by the fiction of merely adopting a new Map showing three Villages instead of two. The rural character of the project site, indeed all of the Planning Area, will be destroyed by plopping an urbanized area the size of Del Mar in the middle of an active agricultural area. Destruction of a designated Semi-Rural agricultural area cannot be interpreted to be "preservation." The RDEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

C1c-158

B. Land Use Goals

"Two economically viable and socially vibrant villages where dense residential uses, as well as commercial and industrial uses, are contained.

"A pattern of development that conserves Valley Center's natural beauty and resources, and retains Valley Center's rural character."

"Development that maintains Valley Center's rural character through appropriate location and suitable site design."

**Comment:** The SP and RDEIR cannot avoid the clear violation of these provisions. Adding a third Village is inconsistent with establishing two existing Villages, consistent with both the GP and CP, the Community Development Model, and the Smart Location requirements of LEED ND. The RDEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

C1c-159

C. Village Boundaries Map

**Comment:** The SP and RDEIR cannot avoid the clear violation of the existing Map, which shows the two, not three villages, by the fiction of merely adopting a new Map showing three Villages instead of two addresses the resulting conflicts with numerous other GP and CP provisions. The RDEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

C1c-160

D. Rural Compatibility

C1c-161

C1c-158 The commenter questions the consistency of the project with the Valley Center Community Plan, raising concerns about protecting the community character goals. The project would amend the community plan to state that the community would include three Villages. This is described in the FEIR in subchapters 3.1.4.1 and 3.1.4.2. Please refer to response to comment C1c-136 for a discussion of how the project is consistent with the VCCP community character goals and policies. Please refer to FEIR, Appendix W, for a thorough discussion of consistency with all project-applicable Valley Center Community Plan policies.

C1c-159 The commenter questions the consistency of the project with the Valley Center Community Plan, raising concerns about protecting the land use goals. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W for a thorough discussion on these topics.

Please refer to FEIR, Appendix W, for a thorough discussion of consistency with all project-applicable Valley Center Community Plan policies.

C1c-160 The commenter questions the consistency of the project with the Valley Center Community Plan, raising concerns about amending the Village Boundaries Map. The Regional Categories Map and Land Use Maps are graphic representations of the Land Use Framework and the related goals and policies of the General Plan. (Chapter 3, page 18.) The General Plan states that it is intended to be a dynamic document and General Plan Policy LU-1.2 permits new villages that are consistent with the Community Development Model and meet the requirements set forth therein. Therefore the language in the General Plan clearly allows for future amendments to the Land Use Map and Regional Categories Map. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on related topic. Please refer to FEIR, Appendix W, for a thorough discussion of consistency with all project-applicable Valley Center Community Plan policies.

LETTER

RESPONSE

	<p>C1c-161 The commenter questions the consistency of the project with the Valley Center Community Plan, raising concerns about rural compatibility such as upholding community design standards.</p> <p>The Specific Plan is used to apply development standards and design refinements to a specific project consistent with the General Plan and the Valley Center Community Plan. The General Plan articulates countywide land use policies while a Specific Plan implements the plan in a particular land use context such as the project site.</p> <p>Chapter I.J (Relationship to General Plan) of the Specific Plan text provides: “The San Diego County General Plan, the Valley Center Community Plan, and the Bonsall Community Plan provide the overall planning policy framework for the Lilac Hills Ranch Specific Plan. Section V of this Specific Plan text and Chapter 4 of the General Plan Amendment Report and Appendix A provides detailed analysis regarding how and why this Specific Plan is consistent with the goals and policies of the County General Plan. The Lilac Hills Ranch Specific Plan is intended to further implement the policies of these documents as set forth in the standards and guidelines provided herein.</p> <p>The Specific Plan includes site level details regarding design and operations that will govern the project as it is implemented during successive site plan approvals to achieve the goals of that plan. For example, the project Specific Plan has specific landscape (e.g., plant pallets) and architectural design standard (e.g., California bungalow, historic 1930s village). The site plan approval process (implementing the Specific Plan) would incorporate the Valley Center Design Guidelines, as applicable, following the special process set forth for applying the “V” setback regulator and the “D” Special Area Designator requirements as described, in Ch. IV of the Specific Plan in p. IV-7. Please refer to Appendix W for a thorough discussion of the project and its consistency with the Valley Center Community Plan and General Plan. The Specific Plan would not replace the Valley Center Design Guidelines with the design guidelines of the Specific Plan and would in fact be required to be consistent with the design standards of the Valley Center Design Guidelines. With regards to concerns about project grading please refer to response to comments C1c-141 and C1c-142. With regards to concerns about topography, please refer to response to comment C1c-144.</p>
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<p><i>"Require new development to adhere to design standards consistent with the character and scale of a rural community. Particularly important: roads follow topography and minimize grading; built environment integrated into the natural setting and topography; grading that follows natural contours and does not disturb the natural terrain; structure design and siting that allows preservation of the site's natural assets; retention of natural vegetation, agricultural groves, rock outcroppings, riparian habitats and drainage areas."</i></p> <p><i>"Require new residential development to construct roads that blend into the natural terrain and avoid "urbanizing" improvements, such as widening, straightening, flattening and the installation of curbs, gutters and sidewalks. Follow Valley Center's Community Right of Way Development Standard."</i></p> <p><i>"Buffer residential areas from incompatible activities which create heavy traffic, noise, odors, dust, and unsightly views through the use of landscaping and preservation of open space."</i></p> <p><b>Comment:</b> Neither the SP nor the RDEIR is clear as to which design standards apply. The SP purports to override all county documents and states it prevails over any inconsistent provisions in the GP, CP, ordinances or design guidelines. In other places, it states some aspect of the project is consistent with the VC Design Guidelines, implying that they would, nevertheless, be applicable. The many pictures, instead of clear text, clearly show urbanized design, out of scale and character for a rural community. The massive grading replaces natural hills with manufactured slopes to accommodate urban design, ignoring natural topography for both roads and residences. The request for deviations from road standards is also in direct conflict with these provisions in the Community Plan. The RDEIR must, but does not, explain and analyze the environmental effects of these discrepancies.</p> <p><b>E. Commercial Goals</b>  <i>"Prohibit strip commercial development by containing commercial uses in the Cole Grade and Valley Center Road area and the Mirar de Valle Road and Valley Center Road area. Application of the Semi-Rural Land Use Designation to currently zoned commercial properties located outside the Villages."</i></p> <p><b>Comment:</b> Neither the SP nor the RDEIR deals with the fundamental fact that the CP establishes commercial uses only in the two existing Villages, and eliminates commercial uses elsewhere, consistent with smart growth principles and the Community Development Model. The Semi-Rural Land Use Designation for the Project Site is required by both the GP and SP to remain so. The RDEIR must, but does not, explain and analyze the environmental effects of this discrepancy.</p> <p><b>F. Agricultural Goals</b>  <i>"Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure continuation of an important rural lifestyle in Valley Center.</i>  <i>Prohibit residential development which would have an adverse impact on existing agricultural uses."</i></p> <p><b>Comment:</b> Neither the SP nor the RDEIR addresses this major thrust of both the GP and CP to "support" Agriculture, not destroy it. The RDEIR must, but does not, explain</p>	<p>C1c-162 The commenter questions the consistency of the project with the Valley Center Community Plan commercial goals. The commenter is incorrect to state that commercial uses may not exist outside the existing villages in Valley Center. The policy referenced prohibits strip commercial outside of the two existing villages. The project does not propose or include strip commercial. Furthermore, to assert that the Community Development Model can only be applied to those villages that have been established by the current General Plan would prohibit the County from amending its General Plan in the future to allow for the establishment of any new villages. While the General Plan does state that villages are intended to grow in compact land development patterns, the General Plan also recognizes the need to accommodate future growth by planning and facilitating housing. (Page 2-7) For further discussion of this topic please refer to response to comment C1c-14. Please refer to FEIR, Appendix W, for a thorough discussion of consistency with project-applicable commercial goals of the Valley Center Community Plan.</p> <p>C1c-163 The commenter questions the consistency of the project with the Valley Center Community Plan agricultural goals. The project is consistent with the Valley Center Community Plan agricultural goals. For example, the Specific Plan allows agriculture uses in any zone within the project site. An additional 20.8 acres of agriculture, outside of the biological open space, will be conserved throughout the community. The project would also preserve and enhance continued and future agricultural operations at a more optimal location, by mitigation measure M-AG-1 that requires the purchase of an agricultural conservation easement for 43.8 acres of prime and statewide importance soils at a 1:1. Finally, the FEIR Agricultural Resources Report includes additional measures where deemed necessary to ensure that no significant unmitigated impacts to existing agriculture will occur, such as: 50-foot-wide buffers planted with two rows of citrus, avocado, or olive trees (M-AG-1); Installation of 6-foot-high fencing to protect adjacent agricultural activities from unwanted intrusions by people and domestic pets (M-AG-2); and prohibition of habitable structures near the project buffer (M-AG-3). Please refer to FEIR, Appendix W, for a thorough discussion of consistency with project-applicable commercial goals of the Valley Center Community Plan.</p>
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and analyze the environmental effects of this discrepancy.

**G. Mobility Goals**

*"Road design shall reflect the rural character and needs unique the Planning Area. For example, turn radii shall be such that agricultural vehicles and equestrian rigs can be safely accommodated."*

*"Road alignment shall minimize the necessity of altering the landscape by following as much as possible the contours of the existing natural topography without sacrificing safety or sight distance criteria."*

*"Required roadside and median landscaping shall reflect standards as outlined in the Valley Center Design Guidelines."*

Policy 12: *"Where a clear circulation need that benefits the overall community, public roads consistent with DPW policy shall be dedicated and constructed. Future subdivisions access public roads via at least two separate access points."*

**Comment:** As noted above, neither the SP nor the RDEIR is clear as to which design standards apply. There appears to have been no consideration of whether this Project can provide two separate LEGAL access points to public roads. Neither was there consideration of whether other public roads within the project would be needed to provide a clear circulation that benefits the entire community (to replace proposed private roads). The massive grading proposed seems a clear violation of the requirement for minimizing altering the landscape and following existing natural topography. The RDEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

**H. Fire Protection Goals**

*"New development using imported water shall provide infrastructure for fire suppression (such as pipes and hydrants) in accordance with the prevailing standards."*

**Comment:** The continued objections of the Deer Springs Fire District to this Project negate compliance with this requirement, yet the SP and RDEIR continue blithely on, as if no objections or deficiencies exist. The RDEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

**I. School Facilities**

*"Coordinate school facility planning with residential development to ensure that school facilities will be available to accommodate the increase in enrollment without overcrowding."*

**Comment:** No school district has accepted the possible additional students generated by the Project. The residential construction will precede, not be coincident with, school construction. The potential school site is conditioned to be turned into additional residences if not accepted by a school district. The RDEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

**J. Open Space Goals**

*"Incorporate publicly and semi-publicly owned land into a functional recreation/open space system wherever feasible. Design new residential development in a way that preserves an atmosphere of openness and access to surrounding open space."*

C1c-163  
cont.

C1c-164

C1c-165

C1c-166

C1c-167

C1c-164 The commenter questions the consistency of the project with the Valley Center Community Plan mobility goals. The project is consistent with the Valley Center Community Plan mobility goals, specifically Policy 12. The Lilac Hills Ranch circulation network includes an interconnected network of private roads that provide multiple internal connections. Lilac Hills Ranch includes four connecting points to existing roads, ensuring that both local and surrounding residents have alternate routes. Please refer to FEIR, Appendix W, for a thorough discussion of consistency with project-applicable mobility goals of the Valley Center Community Plan.

The commenter also states concerns regarding which design standards apply to the project, which is discussed in response to comment C1c-161. Regarding the provision of two separate legal access points to public roads, see Global Response: Easements (Covey Land and Mountain Ridge Road). The Reduced Intensity Alternative (FEIR subchapter 4.6) evaluates a project alternative that considers "weather other public roads within the project would be needed to provide a clear circulation that benefits the entire community," and in which grading for West Lilac Road would be to County standard 2.2C through the northern portion of the project site. This alternative was rejected because the Reduced Intensity Alternative would not reduce the significant and unavoidable visual quality impacts associated with the project. Due to engineering constraints associated with this alternative, smaller lots would be placed adjacent to the northern project perimeter, visual impacts to views along the existing West Lilac Road would be greater under this alternative than for the project. For additional discussion relating to the rejection of this alternative, see FEIR subchapter 4.6.3. Regarding project grading, FEIR Table 1-4 shows grading quantities for the project. As shown in FEIR Figure 1-18 and discussed in FEIR subchapter 1.2.1.10 grading has been designed to minimize impacts. Both cuts and fills are proposed within each grading area. Fill material would be transferred between the areas as required. Overall grading would be balanced on-site with an estimated 4.0 million cubic yards (cy) of balanced cut and fill (less than 2,300 cy per home), without the need for export or import of soil. Regarding topography and the integration of natural features, this is thoroughly

LETTER

RESPONSE

	<p>C1c-164 (cont.) discussed in response to comment C1c-144. As stated previously, the commenter correctly observes, as is discussed in the FEIR in subchapter 2.9, that project construction and development over the 10 to 12 year development phase will cause irreversible changes to the project site.</p> <p>C1c-165 The commenter questions the consistency of the project with the Valley Center Community Plan fire protection goals. The project is consistent with the Valley Center Community Plan fire protection goals. For example, a FPP for the project was prepared in accordance with the DSFPD Ordinance No. 2010-01 and County guidance, and referenced material in the 2011 Consolidated Fire Code, Guidelines for Determining Significance. (See Appendix J to the FEIR) The FPP evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard. The FEIR in subchapter 2.7 analyzes and discusses the potential fire hazards and mitigation to reduce threats to less than significant levels. Please refer to the Global Response: Fire and Medical Services for a thorough discussion of this topic.</p> <p>Please refer to FEIR, Appendix W, for a thorough discussion of consistency with project-applicable fire protection goals of the Valley Center Community Plan. The comments described above are out of date and do not reflect the new comment letter provided by DSFPD, dated July 28, 2014, that states its position with respect to providing fire services to the project. Please refer to the Global Response: Fire and Medical Services for a thorough discussion of this topic.</p> <p>C1c-166 As stated in correspondence dated October 30, 2014 to Mark Slovick, the Bonsall Unified School District has stated interest in using the proposed school site to further their district's needs. With respect to the potential for the site to contain additional residential uses, subchapter 3.1.5 acknowledges that if neither a public or private entity obtains the site, it may be considered for an alternative use. If this site is not needed for a school use, the site could be used for RU uses including residential development by transferring unallocated units to the school site as provided for in the Specific Plan. Any proposal to add residential units above the 1,746 authorized by the plan would require a General Plan Amendment.</p>
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LETTER

RESPONSE

	<p>C1c-167 The project's park system is designed to provide both active and passive recreational opportunities, open to community residents and the general public, including a public park. As further discussed in FEIR subchapter 3.1.6, overall the project will include a total of 11 public and private park areas (of which the private parks in Phases 1-3 are open to the general public, with the exception of P-4).</p> <p>The project is required to provide a minimum of 15.09-acres under the County's Park Lands Dedication Ordinance (PLDO). As shown on Table 4 of the Specific Plan and as discussed in FEIR Chapter 1.0, the project exceeds the County PLDO by providing a total of 19.1 acres of PLDO park land, which includes the required public park (P-7). The project is not subject to the 10-acres per 1,000 people, as that is a regional county goal.</p> <p>Contrary to the comment that 350 homes will be occupied before any parks are constructed, section III-M.14 of the Specific Plan discusses park phasing, which states "The developer shall complete construction of all the private parks located in a particular construction sub-phase (shown on Figure 15(b) as 1A, 1B, and 1C) prior to issuance of 50% of the building permits located in that sub-phase (1A, 1B and 1C) or within two years from 1st building permit issuance in that sub-phase, whichever comes first."</p>
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**Comment:** The SP only tentatively designates a 12-acre public park site. The Project minimally meets the PLDO ordinance 3-acres per 1,000-population requirement, falling woefully short of the 10-acres per 1,000 GP goal for parks. At least 350 homes will be constructed and occupied before any parks, public or private. The SP makes no provision for construction of park amenities, just dedication of raw land. Overall Project site planning appears to destroy any existing connectivity for animal migration, instead of creating or maintaining a functional open space system. The design is to create an isolated urbanized compound totally unrelated to its surroundings. This will be a closed community of urban sprawl, not one with "openness and access to surrounding open space." The RDEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

C1c-167  
cont.

**VI. Conclusion:**

1. **BOTH the Specific Plan and the RDEIR for the project fail to substantiate with evidence the consistency of this project with San Diego GP policies that would justify exemption of this project from prohibition of Leap Frog Development,**
2. **The RDEIR fails to disclose or analyze the array of inconsistencies with the applicable planning documents. By definition the existing General Plan must be amended to accommodate this project. The impacts of these extensive amendments must be addressed.**
3. **Decision makers and the public are deprived of this essential information, which is required by CEQA.**

C1c-168

C1c-168 The commenter makes a concluding statement which is acknowledged. The commenter's opinion is acknowledged and is included in the project's Final FEIR for the decision makers to consider.

**ATTACHMENT I**

SELECTED BRIEF EXCERPTS FROM LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT

*"...Unlike other LEED rating systems, which focus primarily on green building practices and offer only a few credits for site selection and design, LEED for Neighborhood Development places emphasis on the site selection, design, and construction elements that bring buildings and infrastructure together into a neighborhood and relate the neighborhood to its landscape as well as its local and regional context.*

*The work of the LEED-ND core committee, made up of representatives from all three partner organizations, has been guided by sources such as the Smart Growth Network's ten principles of smart growth, the charter of the Congress for the New Urbanism, and other LEED rating systems. LEED for Neighborhood Development creates a label, as well as guidelines for both decision making and development, to provide an incentive for better location, design, and construction of new residential, commercial, and mixed-use developments"*

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#### LEED ND Overview and Process

The LEED 2009 for Neighborhood Development Rating System is a set of performance standards for certifying the planning and development of neighborhoods. The intent is to promote healthful, durable, affordable, and environmentally sound practices in building design and construction.

**Prerequisites** and credits in the rating system address five topics:

- Smart Location and Linkage (SLL)
- Neighborhood Pattern and Design (NPD)
- Green Infrastructure and Buildings (GIB)
- Innovation and Design Process (IDP)
- Regional Priority Credit (RPC)

#### When to Use LEED for Neighborhood Development

The LEED for Neighborhood Development Rating System responds to land use and environmental considerations in the United States. It is designed to certify exemplary development projects that perform well in terms of smart growth, urbanism, and green building. Projects may constitute whole neighborhoods, portions of neighborhoods, or multiple neighborhoods. There is no minimum or maximum size for a LEED-ND project, but the core committee's research has determined that a reasonable minimum size is at least two habitable buildings and that **the maximum area that can appropriately be considered a neighborhood is 320 acres, or half a square mile.**

...

This rating system is **designed primarily for** the planning and development of **new green neighborhoods, whether infill sites or new developments proximate to diverse uses or adjacent to connected and previously developed land.**

Many infill projects or projects near transit will be in urban areas, which helps direct growth into places with existing infrastructure and amenities. LEED-ND also promotes the redevelopment of aging brownfield sites into revitalized neighborhoods by rewarding connections beyond the site, walkable streets within the site, and the integration of any historic buildings and structures that will give the new neighborhood development a unique sense of place.

...

**Size is a defining feature** of a neighborhood and is typically based on a comfortable distance for walking from the **center** of the neighborhood to its edge; that suggests an

area of 40 to 160 acres. In the 1929 Regional Plan of New York and Environs, urban planner Clarence Perry outlined a neighborhood center surrounded by civic uses, parks, residential uses, a school, and retail at the edge, all within one-quarter mile—about a 5-minute walk. This amounts to an area or pedestrian “shed” of 125 acres, or if the land area is a square, 160 acres. Although Perry’s diagram does not address many of the sustainable features of LEED-ND, such as access to multimodal transportation options, location of infrastructure, and building form, it serves as a reference point for the mix of uses and walkable scale of neighborhood development encouraged in the rating system. Most people will walk approximately one-quarter mile (1,320 feet) to run daily errands; beyond that, many will take a bicycle or car. Additional research shows that people will walk as far as a half-mile (2,640 feet) to reach heavy rail transit systems or more specialized shops or civic uses.

**Since half a square mile contains 320 acres, the core committee has decided that this size should serve as guidance for the upper limit of a LEED-ND project.**

**SLL Prerequisite 1: Smart Location**

**Intent**

To encourage development within and near existing communities and public transit infrastructure. To encourage improvement and redevelopment of existing cities, suburbs, and towns while limiting the expansion of the development footprint in the region to appropriate circumstances. To reduce vehicle trips and vehicle miles traveled (VMT). To reduce the incidence of obesity, heart disease, and hypertension by encouraging daily physical activity associated with walking and bicycling.

**Requirements**

**FOR ALL PROJECTS**

Either (a) locate the project on a site served by existing water and wastewater infrastructure or (b) locate the project within a legally adopted, publicly owned, planned water and wastewater service area, and provide new water and wastewater infrastructure for the project.

**AND**

**OPTION 1. Infill Sites**

Locate the project on an infill site.

**OR**

**OPTION 2. Adjacent Sites with Connectivity**

Locate the project on an adjacent site (i.e., a site that is adjacent to previously developed land; see Definitions) where the connectivity of the site and adjacent land is at least 90 intersections/square mile as measured within a 1/2-mile distance of a continuous segment of the project boundary, equal to or greater than 25% of the project boundary, that is adjacent to previous development. Existing external and internal intersections may be counted if they were not constructed or funded by the project developer within the past ten years. Locate and/or design the project such that a through-street and/or non-motorized right-of-way intersects the project boundary at least every 600 feet on average, and at

least every 800 feet, connecting it with an existing street and/or right of way outside the project; non-motorized rights-of-way may count for no more than 20% of the total. The exemptions listed in NPD Prerequisite 3, Connected and Open Community, do not apply to this option.

OR

**OPTION 3. Transit Corridor or Route with Adequate Transit Service**

Locate the project on a site with existing and/or planned transit service such that at least 50% of dwelling units and nonresidential building entrances (inclusive of existing buildings) are within a 1/4 mile walk distance of bus and/or streetcar stops, or within a 1/2 mile walk distance of bus rapid transit stops, light or heavy rail stations, and/or ferry terminals, and the transit service at those stops in aggregate meets the minimums listed in Table 1 (both weekday and weekend trip minimums must be met). Weekend trips must include service on both Saturday and Sunday. Commuter rail must serve more than one metropolitan statistical area (MSA) and/or the area surrounding the core of an MSA.

Table 1. Minimum daily transit service

	Weekday trips	Weekend
trips		
Projects with multiple transit types (bus, streetcar, rail, or ferry)	60	
40		
Projects with commuter rail or ferry service only	24	
6		

If transit service is planned but not yet operational, the project **must demonstrate one of the following**:

- a. The relevant **transit agency has a signed full funding grant agreement** with the Federal Transit Administration **that includes a revenue operations date for the start of transit service**. The revenue operations date must be **no later than the occupancy date of 50%** of the project's total building square footage.
- b. For bus, streetcar, bus rapid transit, or ferry service, the **transit agency must certify that it has an approved budget that includes specifically allocated funds sufficient to provide the planned service at the levels listed above and that service at these levels will commence no later than occupancy of 50% of the project's total building square footage**.
- c. For rail service other than streetcars, the transit agency must certify that preliminary engineering for a rail line has commenced. In addition, the service must meet either of these two requirements: A state legislature or local subdivision of the state has authorized the transit agency to expend funds to establish rail transit service that will commence no later than occupancy of 50% of the project's total building square footage.

OR

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A municipality has dedicated funding or reimbursement commitments from future tax revenue for the development of stations, platforms, or other rail transit infrastructure that will service the project no later than occupancy of 50% of the project's total building square footage."

\*\*\*\*\*

The "Project Checklist" for LEED ND Certification lists mandatory requirements and shows the range of concerns that LEED ND addresses. All of these areas should be addressed before the Accretive project can be declared consistent with the LEED ND standard. None of this analysis has been done.

**LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT  
PROJECT CHECKLIST**

**SMART LOCATION and LINKAGE**

These are PRE-REQUISITE criteria. Compliance is mandatory.

- Prerequisite 1 Smart Location
- Prerequisite 2 Imperiled Species and Ecological Communities
- Prerequisite 3 Wetland and Water Body Conservation
- Prerequisite 4 Agricultural Land Conservation
- Prerequisite 5 Floodplain Avoidance

These are areas of focus and relative priority for LEED ND SMART LOCATION & LINKAGE points and should also be addressed

- Credit 1 Preferred Locations 10
- Credit 2 Brownfield Redevelopment 2
- Credit 3 Locations with Reduced Automobile Dependence 7
- Credit 4 Bicycle Network and Storage 1
- Credit 5 Housing and Jobs Proximity 3
- Credit 6 Steep Slope Protection 1
- Credit 7 Site Design for Habitat or Wetland and Water Body Conservation 1
- Credit 8 Restoration of Habitat or Wetlands and Water Bodies 1
- Credit 9 Long-Term Conservation Management of Habitat or Wetlands and Water Bodies 1

**NEIGHBORHOOD PATTERN AND DESIGN**

These are PRE-REQUISITE criteria. Compliance is mandatory.

- Prerequisite 1 Walkable Streets
- Prerequisite 2 Compact Development
- Prerequisite 3 Connected and Open Community

These are areas of focus and relative priority for LEED ND NEIGHBORHOOD PATTERN and DESIGN points and should also be addressed

- Credit 1 Walkable Streets 12

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- Credit 2 Compact Development 6
- Credit 3 Mixed-Use Neighborhood Centers 4
- Credit 4 Mixed-Income Diverse Communities 7
- Credit 5 Reduced Parking Footprint 1
- Credit 6 Street Network 2
- Credit 7 Transit Facilities 1
- Credit 8 Transportation Demand Management 2
- Credit 9 Access to Civic and Public Spaces 1
- Credit 10 Access to Recreation Facilities 1
- Credit 11 Vistability and Universal Design 1
- Credit 12 Community Outreach and Involvement 2
- Credit 13 Local Food Production 1
- Credit 14 Tree-Lined and Shaded Streets 2
- Credit 15 Neighborhood Schools 1

**GREEN INFRASTRUCTURE AND BUILDINGS**

These are PRE-REQUISITE criteria. Compliance is mandatory.

Prerequisite 1 Certified Green Building

Prerequisite 2 Minimum Building Energy Efficiency

Prerequisite 3 Minimum Building Water Efficiency

Prerequisite 4 Construction Activity

Prerequisite 5 Pollution Prevention

These are areas of focus and relative priority for LEED ND GREEN

INFRASTRUCTURE AND BUILDINGS points and should also be addressed

- Credit 1 Certified Green Buildings 5
- Credit 2 Building Energy Efficiency 2
- Credit 3 Building Water Efficiency 1
- Credit 4 Water-Efficient Landscaping 1
- Credit 5 Existing Building Reuse 1
- Credit 6 Historic Resource Preservation and Adaptive Use 1
- Credit 7 Minimized Site Disturbance in Design and Construction 1
- Credit 8 Stormwater Management 4
- Credit 9 Heat Island Reduction 1
- Credit 10 Solar Orientation 1
- Credit 11 On-Site Renewable Energy Sources 3
- Credit 12 District Heating and Cooling 2
- Credit 13 Infrastructure Energy Efficiency 1
- Credit 14 Wastewater Management 2
- Credit 15 Recycled Content in Infrastructure 1
- Credit 16 Solid Waste Management Infrastructure 1
- Credit 17 Light Pollution Reduction 1

**INNOVATION AND DESIGN PROCESS**

Credits are given for conducting an exemplary process

- Credit 1 Innovation and Exemplary Performance 1-5
- Credit 2 LEED® Accredited Professional 1

- Regional Priority Credit 4 possible points
- Credit 1 Regional Priority 1-4

**Lilac Hills Ranch Consistency Analysis  
Valley Center Community Plan**

**1.6.2 General Comments:**

Rather than proposing a project that is consistent with the County's General Plan (GP), the applicant has simply proposed a general plan and a community plans that are consistent with the project. The purpose of a publicly vetted County GP is to build consensus in a public forum, even if it takes a decade or more. It provides direction and certainty for landowner, developers, public service providers and the County. The introduction of a new, unplanned population in the middle of an area planned for agriculture is not consistent with regional sustainable development (e.g. infill development), nor the Live Well, San Diego health goals (e.g. cleaner air).

C1c-169

C1c-169 The comment expresses the opinions of the commentator that the project is not consistent with the County's General Plan. Please see comment C1c-79.

Furthermore, approval of this project will set a precedent that will serve as a model for future developments that also wish to ignore the County's GP. Every community planning area in the unincorporated county should be acutely concerned about the impacts on their residents from future unplanned projects that may follow suit.

C1c-170

C1c-170 The comment expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

The applicant is using the proposed GPA as a mitigation measure to reduce major impacts to a less than significant level. The project's consistency review uses the applicant's version of the general plan and community plans to determine consistency. This is misleading and not in the spirit of full disclosure. The consistency review for each goal and policy in the Consistency Analysis Matrix (CAM) should indicate whether the project is consistent with the existing, adopted plan. The analysis should then disclose consistency under the applicant's GPA, if it is adopted.

C1c-171

C1c-171 The commenter makes statements about the FEIR not analyzing physical impacts resulting from the project General Plan Amendment. This comment mischaracterizes the analysis framework of the FEIR and statements found in the FEIR. Please see comment C1c-79 above.

The Community Development Model is described as a Village surrounded by areas of lesser intensity. Outside of the Village, Semi-Rural areas would contain low-density residential neighborhoods, small-scale agricultural operations, and rural commercial businesses.

C1c-172

C1c-172 The comment expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Leapfrog development is defined as village densities located away from established villages or established water and sewer boundaries. The GP prohibits leapfrog development that is inconsistent with the Community Development Model. But, in practice (this project for example), isn't the Community Development Model simply village densities located away from other established villages and separated by semi-rural and/or rural lands? Thus, any project that proposes village densities in a semi-rural area (leapfrog development) would meet the criteria of the Community Development Model (a Village surrounded by areas of less intensity). Therefore, the prohibition against leapfrog development is meaningless. One might argue that a Village is more than village densities, that the Village would contain a broad range of pedestrian scale commercial and civic uses that are connected to residential neighborhoods

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through a network of local roads, bicycle lanes and walkways, but if the Village or some portion (town center?) is proposed as Mixed Use with the potential to be developed as residential or commercial, the problem is solved.

C1c-172 cont.

The applicant has used this loophole to claim the project as an exception to leapfrog development. If the project only consisted of residences at village densities, it might be viewed as less than a Village. True, the first phase to be built will consist only of homes. The part of the project that distinguishes it as an actual village with a town center (the part that allows this whole project to qualify as an exception to leapfrog development) may or may not be built, depending on the market. If the "town center" never comes to pass, Valley Center has inherited another dense residential subdivision in the middle of the rural lands the community wanted to preserve. Because the town center is the reason that this project is being considered, there needs to be a mechanism in place to assure that the town center phase is built and that it is built within a few years of the first phase, thereby providing the civic and commercial services to the residents that makes this development a village. For example, the Specific Plan would not vest until building permits were pulled for the town center or the County could enter into a development agreement that would specify this requirement.

C1c-173

The GP update identified Villages by existing land use patterns. Typically the Village is identified as the heart of the community planning area where established commercial and/or civic uses had evolved and residential density is higher than surrounding lands. The Village was delineated as a compact development where uses, rather than ownership, determined the regional category. Often parcels that were not developed were included in the Village by virtue of their adjacency and similarity in features to other parcels in the Village. This also gave the Village the growth potential to support future development.

C1c-174

The unusual shape of the Village proposed for this project and the fact that phases 4 and 5 are only contiguous to the rest of the Village by a single corner suggest that neighboring parcels, especially those to the west of phases 4 and 5, may have a good argument for a change to their regional category as well. There are no major physical differences or even logical divisions such as waterways or roads, only ownership boundaries.

Finally, no other Village in the unincorporated County is split between two community planning areas. For issues not addressed in the Specific Plan, one portion of the Village will be subject to the Bonsall Community Plan and Sponsor Group while the rest is subject to the Valley Center Community Plan and Planning Group. This split could result in some difficult and unintended consequences.

C1c-175

**2. Valley Center Community Plan Consistency Comments**

The Valley Center Community Plan (VCCP), was crafted, refined and vetted by the people of Valley Center, including a very active Community Planning Group and Design Review Board. These participants, as required by Board Policy I-1, hammered out a community vision and devised goals and policies, consistent with the General Plan, to implement that vision.

C1c-176

A vital part of that vision is the integration of two villages – how to define the character

C1c-173 The commenter raises a concern about project phasing and Specific Plan implementation. The commenter is correct in that there is no requirement that all phases of the project will be constructed at a certain point in the project and that the town center be operational within a specific period of time.

Specific plans are described under California Government Code Section §65450 et seq. The purpose of a specific plan is the "systematic implementation" of the general plan. (§65450) It is similar in nature to a zoning ordinance in that it implements the General Plan through the use of development regulations and standards. While there are certain requirements for the contents of specific plans there are no specific requirements related to phasing.

The contents of the project's Specific Plan are consistent with the requirements of California Government Code Section 65451 (a). The Specific Plan contains detailed development standards, distribution of land uses, infrastructure requirements, and implementation measures for development of the project. These development standards and regulations implement the Specific Plan through all of its phases. As each individual proposal is submitted for approval, the proposal must be found consistent with the Specific Plan and its zoning regulations and design criteria.

With respect to the comment that there is no guarantee that the Town Center would ever be built and that just residences at village densities, this scenario would not meet the intent of Policy LU-1.2 (please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a full discussion relevant to these issues.) Walkable communities are distinguished because they have multiple land uses within ½ mile of all the housing. The Project has multiple land uses, some of which are in the Town Center or Commercial Nodes (such as retail, commercial, civic, school, recreation) and some of which are adjacent to the Town Center and Commercial Nodes (such as the parks, trails, recycling center, equestrian staging area, etc). As a result, the Specific Plan ensures that the overall project meets LU-1.2.

Finally, whether through the adoption of a zoning ordinance or a specific plan, there is never a guarantee that a specific geographic area would be built within a specified period of time, since development is ultimately the function of market demand. Rather the purpose of such planning tools are to assure that when such

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	<p>C1c-173 (cont.) development occurs it is consistent with the goals and policies set forth by the legislative body.</p> <p>The project is designed so that each phase of construction would trigger specific mitigation measures that are tied to the physical impacts that would result from that phase of development; As detailed in the Specific Plan, Part IV Implementation, the project phasing provides for flexibility to allow for market variability. The Specific Plan, Section IV Implementation includes a Community Phasing Plan on page IV-1. Construction of the project is anticipated to occur over an eight to twelve year period in response to market demands and to provide a logical and orderly expansion of roadways, public utilities, and infrastructure. The five phases of the project are shown in Figure 15a of the Specific Plan and phasing would be implemented through the recording of the Final Maps. Actual construction of dwelling units could occur in any order. For example, Phase 3 may be constructed after Phase 1, followed by Phase 2, etc. The project's phasing plan is discussed at DEIR FEIR subchapter 1.2.1.10.</p> <p>The applicant would be required to meet various commitments prior to approval of each Tentative Map or Tentative Parcel Map such as providing landscaping, street improvements, parks, open space dedications, and satisfying the mitigation measures included in the FEIR. As a result, regardless of the order of phasing, the environmental impacts would be fully mitigated prior to the impact occurring and be consistent with the requirements set forth in the Specific Plan.</p> <p>C1c-174 The commenter raises concerns about regarding project growth inducing impacts. Regarding growth inducement, the FEIR in subchapter 1.8 thoroughly analyzes various factors, including project density, additional housing, construction, public facilities, fire and emergency services, schools, and water and wastewater services, and concludes that the project could be growth inducing due to the intensification of uses on-site, lower fire response times to the vicinity, and expansion of water and sewer infrastructure. However potential impacts are too speculative for evaluation in this FEIR because of the specific nature, design, and timing of future projects is unknown at this time. The balance of the comment expresses the</p>
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	<p>C1c-174 opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. See also comment C1c-173.</p> <p>C1c-175 The commenter expresses general concern about the project straddling two community planning areas. Comment noted. The comment does not provide any explanation, information, specific examples, or other support for the comment. Nevertheless, there is no county prohibition against a community straddling two planning areas. See also comment C1c-121.</p> <p>C1c-176 The comment addresses general subject areas, regarding the history of community planning in Valley Center, which received extensive analysis in the FEIR and raises the concern of adding another village to the community planning area. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Please also see response to comment C1c-161.</p>
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and identity of each so they are compatible rather than competitive, an extremely difficult and ongoing challenge. Nowhere in that vision, was there any consideration of adding another village to the mix. Now, this applicant proposes to unilaterally commandeer that community vision and revise it to suit the project, dismissing the plans that participants spent years to develop.

C1c-176  
cont.

**3. Project Issue Checklist**

A Project Issue Checklist was prepared by the County listing the issues that the project needed to resolve in order to move forward for public review. Many of the issues were deferred for resolution by allowing the applicant to address them in the EIR. Regarding conformance with the Valley Center Community Plan (VCCP), Item 13, No. 61, raises the issue that The background section of the VCCP indicates that the "2010 SANDAG estimates for population and housing in the Valley Center CPA identify a population of 17,582 with a total of 6,573 housing units." The project would further increase the population and total number of housing units within the community.

C1c-177

**Comment:** This consistency analysis is not included in the Consistency Analysis Matrix (CAM). The project description estimates that the project will add 1,746 homes with an accompanying population increase of 5,185 in an area planned for 110 units. Although the applicant will declare that the increase is consistent with the applicant's version of the VCCP, it is not consistent with the adopted plan.

**4. Community Character Goals and Policies**

*GOAL: Preserve and enhance the rural character by maintaining a pattern of land use consistent with the following regional categories:*

- A. *Village: Enhance the rural village character of Valley Center's north and south villages defined by the current nodes of industrial, commercial and higher density village residential land use designation.*
- B. *Semi-Rural Lands: Preserve and maintain the overall rural and agricultural character of the Semi-Rural areas.*
- C. *Rural Lands: Preserve and maintain the overall rural and agricultural character of the Rural Lands area outside the Semi-Rural area.*

C1c-178

*Policy 1: Require that future projects are consistent with the goals, policies, and recommendations contained in the Valley Center Community Plan.*

*Policy 2: Prohibit monotonous tract developments.*

**Comment:** The CAM lists the above goal but does not provide a consistency analysis. Furthermore, the goal is not stated in its entirety and excludes the portion that applies to preserving and maintaining semi-rural and rural lands. Furthermore, the Project Issue Checklist indicated that Policy 1 would be included in the CAM. It is not.

This goal is limited to two villages, the north and south. It also seeks to preserve the rural and agricultural character of the very 608 acres of semi-rural area that the project will re-categorize as a Village. The project is not consistent with this goal. The Specific Plan (SP) and RDEIR cannot avoid the clear violation of these provisions by the fiction of merely adopting a new Map showing three Villages instead of two. The rural

C1c-177 The statement references a checklist sent by the Planning and Development Services to the Applicant as a part of its processing of its application for this project and have been addressed thorough out the process. The letter predates the public review period of the the prior draft of the project's EIR and the FEIR. CEQA requires that comments on a draft EIR should focus on the sufficiency of the document in identifying an analyzing the possible impacts on the environment and ways in which the project's significant effects might be avoided or mitigated, especially specific alternatives or mitigation measures. (Guidelines 15204(a).) Since the attached letters were written before FEIR was out for public review, the letter goes beyond the scope of CEQA and does not raise any environmental issue with respect to this document. Therefore, no response is required.

C1c-178 The commenter asserts that the Community Character Goals and Policies, Goal 1 A, which aims at preserving and enhancing rural character by maintaining a pattern of land use consistent with regional categories is not analyzed in the consistency analysis matrix. However, this is incorrect. The project is proposing an amendment to the Valley Center Community Plan Goal 1 A to add a third Village consistent with the Community Development Model. Goal 1 B and Goal 1 C are not applicable because the project would change the Regional Categories to Village. The project is consistent with Policies 1 and 2 as explained in FEIR Appendix W. The Lilac Hills Ranch Specific Plan provides as one of its Goals and Policies that it will "... further implement the policies and development standards set forth in the County General Plan, and the Valley Center and Bonsall Community Plans." (Page I-2.) Site Plan approval is required for all development within the project to determine conformance with the Valley Center Design Guidelines. Also, community landscaping will require compliance with the applicable requirements of the Valley Center and Bonsall Design Guidelines.

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character of the project site, indeed all of the Planning Area, will be destroyed by plopping an urbanized area the size of Del Mar in the middle of an active agricultural area. Destruction of a designated Semi-Rural agricultural area cannot be interpreted to be "preservation." The RDEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

**5. Land Use Goals and Policies**

**GOALS:**

- Two economically viable and socially vibrant villages where dense residential uses, as well as commercial and industrial uses, are contained.
- A pattern of development that conserves Valley Center's natural beauty and resources, and retains Valley Center's rural character.
- A pattern of development that accommodates people of diverse ages, lifestyles, occupations, and interests with opportunities for Village, Semi-Rural and Rural living.
- Development that maintains Valley Center's rural character through appropriate location and suitable site design.

**Comment:** The Project Issue Checklist indicated that the applicant would provide an analysis of these goals in the EIR. The first goal is not included in the CAM. The analysis should be about consistency with the existing goal, not the proposed GPA. The SP and RDEIR cannot avoid the clear violation of these provisions. Adding a third Village is inconsistent with establishing two existing Villages, inconsistent with both the GP and VCCP, the Community Development Model, and the Smart Location requirements of LEED ND. The RDEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

**Village Boundaries Map Comment:** The SP and RDEIR cannot avoid the clear violation of the existing Map, which shows the two, not three villages, by the fiction of merely adopting a new Map showing three Villages instead of two addresses the resulting conflicts with numerous other GP and VCCP provisions. The RDEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

**RESIDENTIAL LAND USE GOAL:** *Preserve and enhance the rural character of the Valley Center CPA.*

**Policy 4: Rural Compatibility Issues – Require new development to adhere to design standards consistent with the character and scale of a rural community. Particularly important: roads follow topography and minimize grading; built environment integrated into the natural setting and topography; grading that follows natural contours and does not disturb the natural terrain; structure design and siting that allows preservation of the site's natural assets; retention of natural vegetation, agricultural groves, rock outcroppings, riparian habitats and drainage areas.**

**Policy 5: Rural Compatibility Issues – Require new residential development to construct roads that blend into the natural terrain and avoid "urbanizing" improvements, such as widening, straightening, flattening and the installation of curbs, gutters and sidewalks. Follow Valley Center's Community Right of Way Development Standards.**

**Policy 6: Rural Compatibility Issues -- Buffer residential areas from incompatible**

C1c-178  
cont.

C1c-179

C1c-180

C1c-181

C1c-179 The project would amend the community plan to state that the community would include three Villages. Please refer to response to comment C1c-79.

C1c-180 The commenter questions the consistency of the project with the Valley Center Community Plan, raising concerns about amending the Village Boundaries Map. The Regional Categories Map and Land Use Maps are graphic representations of the Land Use Framework and the related goals and policies of the General Plan. (Chapter 3, page 18.) The General Plan states that it is intended to be a dynamic document and General Plan Policy LU-1.2 permits new villages that are consistent with the Community Development Model and meet the requirements set forth therein. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on related topic. Please refer to FEIR, Appendix W, for a thorough discussion of consistency with all project-applicable Valley Center Community Plan policies.

C1c-181 The commenter expresses concern about the consistent application of design standards to the project.

Chapter I.J (Relationship to General Plan) of the Specific Plan text provides: "The San Diego County General Plan, the Valley Center Community Plan, and the Bonsall Community Plan provide the overall planning policy framework for the Lilac Hills Ranch Specific Plan. Section V of this Specific Plan text and Chapter 4 of the General Plan Amendment Report and Appendix A provides detailed analysis regarding how and why this Specific Plan is consistent with the goals and policies of the County General Plan. The Lilac Hills Ranch Specific Plan is intended to further implement the policies of these documents as set forth in the standards and guidelines provided herein."

The Specific Plan contains the required design standards to successfully implement the project consistent with the General Plan. For example, the project Specific Plan includes specific landscape (e.g. plant pallets) and architectural design standards (e.g., California bungalow, historic 1930s village) and has operational standards for infrastructure facilities (e.g. low flow showerheads, solar oriented building siting). The site plan approval process would incorporate the

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	<p>C1c-181 (cont.)</p> <p>locally formulated Valley Center Design Guidelines, as applicable, following the special process set forth for applying the “V” setback regulator and the “D” Special Area Designator requirements as described, in Ch. IV of the Specific Plan at p. IV-7.</p> <p>The application of design standards is thoroughly discussed at response to comment C1c-161. The project’s consistency with the Valley Center Community Plan regarding grading and topography are also thoroughly discussed at response to comment C1c-161.</p> <p>Further, the project’s consistency with the Valley Center Community Plan Goal 4 (Mobility) is thoroughly discussed in FEIR Appendix W.</p> <p>The project is consistent with this Rural Compatibility Policy 5 since it will adhere to the Valley Center Community Right of Way Development Procedures, as applicable, as indicated in the Specific Plan on page II-26. Regarding Rural Compatibility Policy 4, grading guidelines ensure natural topography on the site is adhered to, wherever possible, by applying refined grading techniques, including curvilinear and undulating shapes. The proposed roads would follow the natural topography and minimize grading for roads to the minimum necessary without compromising safety. Where required, the installation of curbs, gutters, and sidewalks will be according to County and State standards. The Specific Plan includes a thorough discussion of Road Landscaping design standards and regulations in Subchapter III.D.3 starting on page III-18. The Specific Plan illustrates on Figures 25 through 53 the typical street cross sections, with parallel community pathways featuring trees, shrubs, rustic fencing, permeable surfacing, such as decomposed granite, which promotes a rural, rustic atmosphere. Thus, the project is consistent with Rural Compatibility Policy 5.</p> <p>The project is consistent with Rural Compatibility Policy 6 since the project is consistent with the Community Development Model which includes feathering at the project boundaries to create a seamless transition to the surrounding Semi-Rural land use. Furthermore, there are no uses as the project periphery which would create heavy traffic, noise, odors, dust, or unsightly views. The project periphery to the east would be fully landscaped with trails, and 50 foot wide orchard buffers; project features to the west would consist of</p>
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<p><i>activities which create heavy traffic, noise, odors, dust, and unsightly views through the use of landscaping and preservation of open space.</i></p> <p><b>Comment:</b> Neither the SP nor the RDEIR is clear as to which design standards apply. The SP purports to override all county documents and states it prevails over any inconsistent provisions in the GP, VCCP, ordinances or design guidelines. In other places, it states some aspect of the project is consistent with the VC Design Guidelines, implying that they would, nevertheless, be applicable. The many pictures, instead of clear text, clearly show urbanized design, out of scale and character for a rural community. The massive grading replaces natural hills with manufactured slopes to accommodate urban design, ignoring natural topography for both roads and residences. The request for deviations from road standards is also in direct conflict with these provisions in the Community Plan. The CAM does not include Policies 5 (as stated in the Project Issue Checklist) or Policy 6 for consistency analysis. The RDEIR must, but does not, explain and analyze the environmental effects of these discrepancies.</p> <p><i>Policy 9: Infrastructure Issues – Prohibit residential development which would prematurely subdivide land and require expansion of public utilities and service to such developments.</i></p> <p><b>Comment:</b> Even if the project site is within the boundaries of a water district or a fire protection district, the issue here is not capability to serve. The issue is the premature subdivision of land. The General Plan was specifically designed to accommodate the population projected by SANDAG through the year 2050. The consistency analysis should discuss why the proposed subdivisions are needed and are therefore not premature.</p> <p>COMMERCIAL LAND USE GOAL: <i>Commercial uses are concentrated within the boundaries of two compact scale, "Rural Villages" that are consistent in scale and design with a low density rural residential and agricultural community.</i></p> <p><i>Policy 1: Prohibit strip commercial development by containing commercial uses in the Cole Grade and Valley Center Road area and the Mirar de Valle Road and Valley Center Road area. Application of the Semi-Rural Land Use Designation to currently zoned commercial properties located outside the Villages.</i></p> <p><b>Comment:</b> The CAM misstates this policy and the analysis is incorrect. Neither the SP nor the RDEIR deals with the fundamental fact that the VCCP establishes commercial uses only in the two existing Villages, and eliminates commercial uses elsewhere, consistent with smart growth principles and the Community Development Model. The Semi-Rural Land Use Designation for the Project Site is required by both the GP and VCCP to remain so. The RDEIR must, but does not, explain and analyze the discrepancy.</p> <p><i>Policy 8: Discourage commercial and civic uses outside of the Villages and limit all such uses to those that are clearly demonstrated as needed and which are compatible with the rural lifestyle of the Valley Center Community Plan.</i></p> <p><b>Comment:</b> The CAM says the project is consistent with this policy. Clearly the project is proposing commercial and civic uses outside the Villages as defined in the adopted VCCP. The planned Villages are both just beginning to develop and are finding it</p>	<p>C1c-181 (cont.) biological open space and parks. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on the application of “feathering” techniques, such as positioning open space and trails at the project perimeter, under the Community Development planning model. Please also refer to Appendix W for a thorough discussion of this topic.</p> <p>C1c-181 cont.</p> <p>C1c-182 The commenter expresses concern about project consistency with Rural Compatibility Policy 9. Lilac Hills Ranch is located within an area where existing or planned infrastructure can service and support the project. It is located a quarter-mile from the Interstate 15 corridor in the unincorporated area of San Diego County with freeway access at the Old Highway 395 Interchange. The project is also within the boundaries of the Valley Center Municipal Water District and the Deer Springs Fire Protection District. A Capabilities Assessment was prepared by Dudek and Hunt (2014) that shows there is capacity to serve the project at build out. There is existing water infrastructure on-site including transmission lines to the site, numerous meters, and two water tanks. The Water Supply Assessment approved by the VCMWD confirmed that the Community’s imported water use will be equal to or less than the imported water use after project implementation. Furthermore, as discussed in response to comment C1c-97, the VCWMD has provided Project Facility Availability Forms from the VCMWD for both sewer and water, which indicate that the project is in the district, eligible for service, and facilities are expected to be available within the next 5 years. Thus, the project is consistent with Rural Compatibility Policy 9. Please refer generally to Appendix W for a thorough discussion of this topic.</p> <p>The commenter adds a statement about the project in relation to SANDAG regional growth forecasts and planning efforts. Refer to comments C1c-6 and C1c-117 for a related discussion.</p> <p>C1c-183 The commenter questions consistency with the Commercial Land Use Goal Policy 1, concerning potential commercial development on Valley Center Road and Mirar de Valle. The project proposes a new Village which would contain commercial development. This policy would not apply to this project in the event of the establishment of a new Village. Please refer generally to Appendix W for a thorough discussion of this topic.</p>
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LETTER

RESPONSE

	<p>C1c-184 The commenter questions consistency with the Commercial Land Use Goal Policy 8, asserting that the project would contribute to blight in existing commercial areas within existing villages. While economic and social effects ordinarily need not be discussed in an EIR, physical changes, such as blight, are secondary impacts that must be analyzed if they are significant. The potential for commercial uses in the project blighting other parts of the community planning areas is too speculative. The commercial uses intended for the project will be sized to meet the needs of the project. The Specific Plan Design Guidelines for the Town Center and Neighborhood Centers discourages big box type commercial uses within the project area. The Design Guidelines for the Town Center encourage architecture reminiscent of rural, early 20th century, California mixed-use villages, where the store fronts have varied heights, parapets, flat and pitched roofs, entry motifs, and other features providing a small town feel. (Specific Plan, Subchapter III.C.2 on page III-12. Conceptual illustrations are found in the Specific Plan on Figures 74 through 93. Thus the project is consistent with Commercial Land Use Goal, Policy 8. Please refer generally to Appendix W for a thorough discussion of this topic. See also response to comment C1c-183.</p>
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difficult to attract commercial investors. In addition, pending business development on local tribal lands is also a factor. Adding a third village to the competition could potentially attract business away from the planned villages and harm their future development. The analysis should clearly demonstrate the need for these additional commercial and civic uses without resorting to the circular argument that the proposed residential components of the project require it.

C1c-184 cont.

**AGRICULTURAL LAND USE GOAL:** *Preserve and enhance existing and future agricultural uses in the Valley Center Community Plan.*

**Policy 1:** *Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure continuation of an important rural lifestyle in Valley Center.*

**Policy 3:** *Prohibit residential development that would have an adverse impact on existing agricultural uses.*

C1c-185

**Comment:** The CAM states that the project is consistent with the VCCP agricultural goals and policies because it would not have any land use conflicts with existing agricultural zoning. Yet, there are several proposed mitigation measures to ensure that no significant unmitigated impacts to existing off-site agriculture will occur. The proposal of mitigation measures refutes the statement that the project has no land use conflict with existing agricultural zoning. Furthermore, the off-site preservation of agricultural lands may mitigate the loss of agricultural acreage but there is still a net loss. Neither the SP nor the RDEIR addresses this major thrust of both the GP and VCCP to "support" Agriculture, not destroy it. The RDEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

**6. Mobility Goals and Policies**

**GOAL:** *A circulation system that achieves the combined objectives of connectivity and safety for all users and also preserves the rural character of the community.*

**Policy 2:** *Road design shall reflect the rural character and needs unique to the Planning Area. For example, turn radii shall be such that agricultural vehicles and equestrian rigs can be safely accommodated.*

**Policy 4:** *Road alignment shall minimize the necessity of altering the landscape by following as much as possible the contours of the existing natural topography without sacrificing safety or sight distance criteria.*

C1c-186

**Comment:** The CAM states that the project is consistent with the above goal and policies but then qualifies the statement by stating the necessity of modifying the very standards on which the mobility goal and policies are based. Consistency does not require modification. What happens to the consistency claim if the Clear Space Easements are not granted? The massive grading proposed seems a clear violation of the requirement for minimizing altering the landscape and following existing natural topography. The RDEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

**Policy 12:** *Where a clear circulation need that benefits the overall community, public roads consistent with DPW policy shall be dedicated and constructed. Future*

C1c-187

C1c-185 The commenter questions consistency with the Agricultural Land Use Goal, Policies 1 and 3.

The project meets Policy 1 by supporting and complementing agricultural uses and activities through the Goals and Policies in the Specific Plan. Specifically, the proposed zoning and land uses within the Specific Plan include agriculture as an allowed use within much of the project site including edge buffers, common areas, open space areas and manufactured slopes. HOA-maintained agricultural open space would be permitted, including groves of orchard trees, such as avocado and citrus. Other agricultural-related commercial uses may be established by the project within the C34 zoned areas and would include such uses as farmers markets and wineries which support the local agricultural industry. Please see Appendix W for response to Policy 7.1, which discusses protection of agricultural lands with lower density land use designations that support continued agricultural operations.

The project proposes to amend the General Plan Semi Rural Lands land use designation to create a new Village. While the project would increase the density allowed and convert existing agricultural lands to non-agricultural uses, the project would still comply with the intent of Policy 3 in the following ways: (1) The project would preserve approximately 43.8 acres of agriculture off-site through the purchase of PACE program mitigation credits or through the preservation of off-site agricultural resources based on the County's Guidelines for the Determination of Significance for Agriculture (CEQA). (2) The site is not located within a Williamson Act Contract or an Agricultural Preserve. (3) Approximately 20.3 acres of agriculture would remain on-site within the biological open space and agricultural buffers (See Exhibit A - Agriculture to Remain), and agriculture could be established within the manufactured open space areas, which could include community gardens (page II-19 of the Lilac Hills Ranch Specific Plan). (4) Impacts to off-site agriculture would be less than significant through the implementation of mitigation measures, including agricultural buffers, fencing, and fuel modification zone restrictions. (5) Other compatible agricultural

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	<p>C1c-185 (cont.) uses would be allowed by the Specific Plan, such as farmers' markets (page III-62 of the Lilac Hills Ranch Specific Plan), community gardens (page III-55 of the Lilac Hills Ranch Specific Plan) and vineyards (see Vineyard Park P-9 in the Lilac Hills Ranch Specific Plan).</p>
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RESPONSE

	<p>C1c-186 The comment addresses discussion in the Consistency Analysis Matrix about the private roads within the project community and how they may be modified in accordance with the County's policy for Roadway Exceptions. Approval of any such street exceptions for the project would still be consistent with Policy 2 of the Valley Center Community Plan's Mobility Goal relating to rural character. Chapter III.B.2.a of the Specific Plan establishes special standards for development of the project's private roads to ensure they "reflect the traditional character and rural theme of the Community." Further, a number of Specific Plan Policies require roadways in the project to be designed in a manner that would minimize impacts to significant biological, environmental, and visual resources. Policy 8 of the Specific Plan limits disturbance and development to only those areas shown in the Specific Plan. Policy 9 of the Specific Plan requires a safe and efficient circulation system that supports the project, links to regional transportation elements when appropriate, and minimizes impacts to residential neighborhoods and environmentally sensitive areas. The Specific Plan also sets forth project road design standards, as well as the site plan processes, to ensure consistent application to the project. All internal roads are designed to reinforce the rural atmosphere of the community by reducing design speed and retaining two lanes.</p> <p>Also, no claimed inconsistency with Policy 4 of the Mobility Goal would occur if clear space easements referenced in the comment were not granted. If the clear space easements were not granted, the County would acquire the easement area by eminent domain with funds provided by the project applicant as discussed at FEIR subchapter 1.2.1.4. The project would therefore still be consistent with the sight distance criteria stated in Policy 4.</p> <p>The project is also seeking to change the Mobility Element designation for West Lilac Road from a Light Collector 2.2C to a Light Collector 2.2F from Main Street to Road 3 (Running Creek Road) to ensure that it remains compatible with the character of the area and minimizes impacts on adjacent residences. In addition, exceptions have been requested as part of the project approvals including a segment of West Lilac Road along the project frontage which does not meet public road standards that would avoid significant grading of steep slopes and disruption of existing driveways.</p>
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	<p>C1c-86 (cont.) The project's consistency with the Valley Center Community Plan regarding grading and topography issues referenced in the comment are also thoroughly discussed at response to comment C1c-161.</p> <p>C1c-187 The commenter raises concerns about regarding consistent application of design standards with respect to Mobility Goals and Policies, Policy 12. The project is consistent with Policy 12; The Lilac Hills Ranch circulation network includes an interconnected network of private roads that provide multiple connections. Lilac Hills Ranch includes <b>four</b> connecting points to existing roads, ensuring that both local and surrounding residents have alternate routes. The mitigation measures listed on Table 10.5 of the project's FEIR, would reduce impacts associated with traffic congestion to less than significant where feasible. All of the roads within the project will meet the requirements of the Consolidated Fire Code. The Specific Plan sets forth project road design standards, as well as the site plan processes, to ensure consistent application to the project. Please also refer to responses to comments C1c-161 or C1c-181 for a thorough discussion of the application of design standards to the project. Concerning illegal access points, please refer to the Global Response: Road Easements (Covey Lane and Mountain Ridge Roads) for a thorough discussion of this topic.</p>
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<p><i>subdivisions access public roads via at least two separate access points.</i></p> <p><b>Comment:</b> As noted above, neither the SP nor the RDEIR is clear as to which design standards apply. There appears to have been no consideration of whether this Project can provide two separate LEGAL access points to public roads. Neither was there consideration of whether other public roads within the project would be needed to provide a clear circulation that benefits the entire community (to replace proposed private roads). The RDEIR must, but does not, explain and analyze the environmental effects of these discrepancies.</p> <p><b>7. Public Facilities and Services Goals and Policies</b></p> <p><i>GENERAL GOAL: Adopt an active program of coordination between the allowable growth of population and the infrastructure serving it to ensure at all times that the public welfare and safety are guaranteed.</i></p> <p><b>Comment:</b> This goal ensures that there is concurrency between development and the infrastructure necessary to support it. The CAM should discuss how the infrastructure to support this village will be proportionately built along with residences and businesses</p> <p><b>FIRE PROTECTION GOAL AND POLICIES</b></p> <p><i>GOAL: Protect all life and property from fire hazard potential and minimize those elements within the natural and human made environment that pose a clear and significant fire hazard. Ensure adequate levels of fire protection.</i></p> <p><i>Policy 1: All new development using imported water shall provide infrastructure for fire suppression (such as pipes and hydrants) in accordance with the prevailing standards.</i></p> <p><i>Policy 3: New site locations for fire stations within the plan area should be centrally and strategically located.</i></p> <p><b>Comment:</b> The CAM analysis for Policy 3 states that Option 1 has been identified as the most efficient and cost-effective approach. The analysis should state who made this identification and whether this approach is supported by the Deer Springs Fire District. Is this option part of the proposed project or one of the alternatives? The continuing objections of the DS Fire District to this Project negate compliance with these policies, yet the SP and RDEIR continue blithely on, as if no objections or deficiencies exist. The RDEIR must, but does not, explain and analyze the environmental effects of this discrepancy.</p> <p><b>SCHOOL FACILITIES GOAL AND POLICIES</b></p> <p><i>GOAL: Ensure the provision of adequate services and facilities to meet the educational needs of all the residents of the Community Planning Area.</i></p> <p><i>Policy 1: Coordinate school facility planning with residential development to ensure that school facilities will be available to accommodate the increase in enrollment without overcrowding.</i></p> <p><b>Comment:</b> No school district has accepted the possible additional students generated by the Project. The residential construction will precede, not be concurrent with, school construction. The potential school site is conditioned to be turned into transferred residences if not accepted by a school district. The RDEIR must, but does not, explain</p>	<p>C1c-187 cont.</p> <p>C1c-188</p> <p>C1c-189</p> <p>C1c-190</p> <p>C1c-188 As detailed in the Draft FEIR Chapter 1.0, the project proposes the development of a sustainable village, which would provide infrastructure, utilities, and the availability of goods and services intended to serve the village. The project would be responsible for the construction and improvement of roadways and provision and extension of public facilities, which would be sized to serve the project's population. See also the discussion in the FEIR regarding the transportation system network, sewer and schools at subchapters 2.3, 3.1.7, and 3.1.5 respectively and Appendix W regarding General Plan Policy conformance</p> <p>C1c-189 The commenter questions project consistency with Fire Protection Goals and Policies, Policy 1 and Policy 3. Fire hazards associated with the proposed project are discussed in FEIR subchapter 2.7.2.4. Mitigation for potential wildland fires is provided in subchapter 2.7.5. Mitigation Measure M-HZ-1 provides alternative measures, including obtaining off-site permission to clear, or include additional ignition-resistant construction methods and other non-combustible features, or construct fire barrier walls that would achieve the same level of protection from potential wildfires as the 100-foot buffer. This Mitigation Measure would reduce impacts of wildland fires to less than significant. DSFPD currently experiences relatively low call volumes (1.4 calls per station per day including Station 15). This is described further in the Fire Protection Plan (FPP) and is detailed in both Appendix L to the FPP and the Lilac Hills Ranch Fire Service Response Capabilities Assessment (Capabilities Assessment), attached as an Appendix to the Specific Plan. Please also refer to the Global Response: Fire and Medical Services for a thorough discussion of these topics. Please also refer to Appendix W for a thorough discussion of this topic. Thus, the project is consistent with the Fire Protection Goals and Policies, Policy 1 and Policy 2.</p> <p>C1c-190 The commenter raises concerns regarding project consistency with School Facilities Goal and Policies, Policy 1, regarding future acceptance of students generated by the project. The project will pay all fees required by state law and/or enter into an agreement with the school District. Project facility forms are included in the FEIR, Appendix R and demonstrate that school facilities will be available to meet the needs of future students generated by the project. Thus the project is consistent with the Mobility Goals and Policies, Policy 12.</p>
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and analyze the environmental effects of these discrepancies.

SEWAGE DISPOSAL AND TREATMENT GOAL: *Ensure the provision of sewage disposal and treatment in a manner that minimizes any adverse impacts to the health, safety and welfare of the community.*

**Comment:** Consistency analysis for this goal should be included in the CAM.

**8. Conservation Goals and Policies**

GOAL: *Preserve Valley Center's unique, natural and cultural resources while supporting its traditional semi-rural lifestyle.*

*Policy 2: Restrict hillside cutting and scarring, loss of wild life habitat, loss of riparian habitat and loss of floodplains.*

The massive grading proposed seems a clear violation of the requirement for minimizing altering the landscape and following existing natural topography. The RDEIR should discuss the amount of grading and how it relates to a finding of consistency with this policy.

*Policy 7: Preserve oaks, sycamores, eucalyptus, olive trees, pines, and other individual specimen trees that contribute to the community character and provide wildlife habitat.*

**Comment:** The CAM analysis discusses planting trees but does not discuss preservation of the trees listed in Policy 7.

*Policy 11: Grading associated with discretionary permits shall not change natural land contours and shall be minimized to reduce erosion and siltation and damage to downstream properties.*

**Comment:** The CAM analysis seems to infer that this policy would only be enforceable for RPO slopes. This policy applies to all permitted grading. The project is declared consistent while, in the same paragraph, stating that "Landform grading techniques will require blending and rounding of slopes, roadways, and pads to reflect the existing surrounding contours by undulating slopes and replicating the natural terrain." The Master Preliminary Grading Plan proposes four million cubic yards each for cut and fill. This project is definitely changing natural land contours. The analysis also states that the natural topography of the site would be maintained. The correct word would be mimicked.

**9. Open Space Goal and Policies**

GOAL: Support a system of open space that is adequate to preserve the unique natural elements of the Community, enhance recreational opportunities, conserve scenic resources and retain the rural community character.

*Policy 3: Incorporate publicly and semi-publicly owned land into a functional recreation/open space system wherever feasible. Design new residential development in a way that preserves an atmosphere of openness and access to surrounding open space.*

**Comment:** The SP only tentatively designates a 12-acre public park site. The Project minimally meets the PLDO ordinance 3-acres per 1,000 population requirement, falling

C1c-190 cont.

C1c-191

C1c-192

C1c-193

C1c-194

C1c-191 The project is consistent with the VCCPG Sewage Disposal and treatment Goal. The initial development of the project would be provided wastewater service by the transfer of wastewater from a collection point on-site, to the Lower Moosa Canyon WRF, up to a maximum of 250,000 gallons of wastewater per day. The project proposes four potential permanent wastewater treatment system scenarios options which could serve the project. Each option so analyzed in FEIR subchapter 3.1.7. All options would assure that necessary infrastructure and equipment required to serve the project would be upgraded and/or installed. All options include adequate treatment and processes and implementation of any of the aforementioned options would provide adequate wastewater service. All options would be designed to meet VCMWD criteria. In addition the San Diego RWQCB would need to permit all aspects of the treatment and reuse for each options. The State Water Resources Control Board, Division of Drinking Water Health Department would also need to review and approve all of the recycled water system. Please also refer to Appendix W for a thorough discussion of this topic.

C1c-192 and C1c-193

The commenter raises concerns regarding project consistency with Conservation Goals and Policies, Policies 2, 7 and 11. Concerning preservation of trees, the FEIR discusses this in the context of the preservation of 104.1 acre for a permanent on-site biological preserve. (FEIR, Subchapter 2.5, and Appendix G. Grading for the project maintains the overall general contour of the property, requiring 2,300 cubic yards of grading per home, which would require a minor grading permit on an individual lot basis). This is consistent with projects of this size. 99.7 percent of all steep slopes are retained in open space and private roads are used that reduce grading by reducing the design speeds and overall development foot print, and following the contours of the property. Please refer to response to comments C1c-141 and C1c-142 for a thorough discussion of this topic. Concerning preservation of site topography, please refer to response to comment C1c-144. Thus the project is consistent with Conservation Goals and Policies, Policies 2, 7 and 11.

<p>woefully short of the 10-acres per 1,000 GP goal for parks. At least 350 homes will be constructed and occupied before any parks, public or private. The SP makes no provision for construction of park amenities, just dedication of raw land. Overall Project site planning appears to destroy any existing connectivity for animal migration, instead of creating or maintaining a functional open space system. The design is to create an isolated urbanized compound totally unrelated to its surroundings. This will be a closed community of urban sprawl, not one with "openness and access to surrounding open space." The Project Issue Checklist states that this policy will be analyzed in the EIR. The CAM should include it. The RDEIR must, but does not, explain and analyze the environmental effects of these discrepancies.</p> <p><b>10. Parks and Recreation Goal and Policies</b></p> <p>GOAL: Develop a comprehensive plan of local, neighborhood, community and regional parks and facilities directed to the needs of all age levels and which use, whenever feasible, outstanding natural features of the Community Planning Area.</p> <p><b>Comment:</b> See comment above under Open Space.</p> <p><b>11. Noise Goals and Policies</b></p> <p>GOAL: <i>Maintain an environment free of excessive noise by providing control of noise at its source, along the noise transmission path and at the receiver site.</i></p> <p><i>Policy 1: Develop and implement land use plans and circulation patterns that will minimize noise in residential neighborhoods.</i></p> <p><i>Policy 5: Minimize traffic noise impacts by means of roadway alignment and design and the management of traffic flows.</i></p> <p><b>Comment:</b> The RDEIR demonstrates that noise generated by additional traffic, stationary operational sources and construction will be significant. Many mitigations measures are needed and many are deferred until a later time. An issue of particular concern is the impact on off-site properties. According to the RDEIR, a significant noise increase would occur along Covey Lane and future Lilac Hills Ranch, impacting existing off-site residences. "Several methods are available to attenuate traffic noise, such as noise barriers, road surface improvements, regulatory measures (such as lower speed limits), and traffic calming devices (such as speed bumps). However, none of these measures are considered to be feasible for a variety of reasons. As an example, a continuous barrier on private property would be effective. However, the need to provide openings in the wall for driveway access would make a continuous, solid barrier infeasible. In addition, some measures may not be desired by the local residents due to visual or traffic safety impacts. Other measures, such as reduced speed limits or traffic calming devices may negatively affect traffic circulation and emergency response times. Due to these reasons, mitigation of off-site impacts along Covey Lane and the future Lilac Hills Ranch Road are considered significant and unavoidable direct and cumulatively considerable impacts of the project."</p> <p>How can the CAM find the project consistent with the above goal and policies when it will result in significant and unavoidable direct and cumulative impacts?</p>	<p>C1c-194 and C1c-195</p> <p>The project is consistent with the VCCPG Open Space Goal. Project parks and trails are integrated with the dedicated 104.1 acre Biological Open Space. EIR, Figure 1-9 (Open Space and Parks) illustrates the adjacency of the open space to four parks, including the largest Community Park and to the school site recreational area (Policy 2). Additionally, EIR, Figure 1-4a (Lotting Study) and Figure 1-8 (Trails Plan) show the integration between the developed areas, the 104.1 acre open space and the 23 points of access to the 16 plus mile trail system. The trails plan also shows three links to the regional trail system (Policy 5). The 104.1 acre Biological Open Space will be required to be dedicated and placed in a permanent open space easement. The easement will be owned by a conservancy, the County, or other similar, experienced entity subject to approval by the County. Therefore the project is consistent with all relevant policies of the Open Space Goal.</p> <p>The project is also consistent with VCCPG Policy 3 of the Parks and recreation Goal. The project includes 23.6 acres of parks including 10.1 acres of private parks, and one main 13.5 acre community public park. The project also includes a 12.0 acre elementary school site. The main public park and the school site are collocated, as shown in EIR, Figure 1-4a. Maintenance of the public park would be the responsibility of the HOA in perpetuity and the park must be maintained to County standards. Therefore the project is consistent with the policy.</p> <p>C1c-196 The project is consistent with the VCCPG Noise Goal. The project Noise Report, has been prepared (FEIR, Noise Report, and Appendix M). Project noise impacts have been analyzed in the FEIR in Chapter 2.8. Twenty measures and practices will be required to minimize project noise, as summarized in the FEIR at Table S-1. Off-site noise impacts would remain significant and unavoidable at the locations identified in the comment. The project is still considered consistent because noise impacts are minimized to the lowest degree feasible as required under CEQA and the Noise Goal. Please also refer to Appendix W for a thorough discussion consistency with the Noise Goal. Thus, the project is consistent with the Noise Goals and Policies, Policy 1.</p>
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GPA for VCCP

This project proposes an enormous change to the Community Plan and yet the only text revisions are changing "two" villages to "three" and a brief description of the specific plan. The description under the Specific Plan Areas section should be as comprehensive as the other specific plans. The VCCP is part of the County's General Plan. A specific plan must be consistent with the General Plan. Therefore, the description of the specific plan in the VCCP should be very clear and detailed in order to ensure that underlying projects are implemented as promised.

The revised version of Figure 4, Valley Center Generalized Specific Plans, should show the Lilac Ranch Specific Plan which is still identified in the VCCP text.

C1c-197

**1.8 Growth Inducing Impacts**

It should be noted here that although the County said it would provide a version of the RDEIR that reflected deletions from the original DEIR using strikeout type and new material using underline type, that protocol was not followed in this portion of the RDEIR. It was necessary to compare the original DEIR to the current RDEIR in order to understand what changes were made from one version to the other. This was unduly time consuming. What was the County's purpose in not indicating all of the deleted material?

C1c-198

**1.8. Growth Inducing Impacts**

Apparently, the folks who wrote this section of the RDEIR have not lived in southern California for long, are unaware of the history of development here and/or do not understand the need to consider growth inducement. The DEIR version from July 2013 made the statement that "While the project site and surrounding areas are not identified in the General Plan for growth, it is a location where such growth is likely to occur because the project area can accommodate the growth." Such tortured, circular logic makes any reasonable explanation for the conclusion unattainable. But, it is emblematic of the kind of perverted logic that is used throughout the RDEIR in 2014. Growth can occur anywhere we choose to place it. We, as a community, make such determinations about the location and types of growth based on land use planning, zoning and community consensus. That is how we arrived at the General Plan [it took 12 years and \$18.6 million to do it]. To abandon the General Plan simply because growth can occur at a given place begs the question why have a General Plan at all? The California legislature reasonably concluded that each county must have a general plan to guide growth, hopefully logically, but at least, in an ordered way. Prospective property owners are able to go to the General Plan to determine what kind of development is likely to occur around the property they wish to buy. That kind of research is useless if the General Plan can be drastically changed before the ink is dry on its first printing.

C1c-199

**1.8.1 Growth Inducing Impacts Due to General Plan Amendment (Increases in Density)**

C1c-200

C1c-197 There is no legal requirement under state Law to add a Specific Plan into community plans. A Specific Plan stands on its own and is in enforceable whether or not included in a community plan (please refer to C1c-173 above). Nevertheless, the community plan is proposed to be amended to include a description of the Lilac Hills Ranch Specific Plan and to add the proposed project to the land use map. Please refer to Section IV of the Specific Plan which contains all requirements for implementing permits.

C1c-198 The commenter asserts that it was onerous to determine the types of revisions that occurred between the release of the draft EIR and the FEIR. However, the FEIR was made widely available on the County's website and was formatted in strikeout/underline in order to clearly illustrate text revisions. It is unclear why the commenter found this exercise time consuming.

C1c-199 The comment expresses the opinions of the commentator, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Please see Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W.

C1c-200 The comment expresses the opinions of the commentator, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Please see Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W.

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<p>The proposed addition of 1746 equivalent dwelling units [EDU] could take place virtually anywhere in the County using the fast and loose logic presented in this RDEIR. Of course, maybe that is the plan: approve a general plan, any general plan, and then simply change it when it is convenient to do so. It's much less messy than debating the best course for the County's land use plan, arriving at some consensus and then defending the plan in the face of development requests that have no intention of addressing, much less complying with, the General Plan. Why is the County failing to defend the goals and policies of the General Plan when confronted with projects such as this one? Where in the General Plan does it offer a pass for projects that, like this one, fail to comply with so many of the goals and policies of the plan?</p> <p>If this Project is approved, the County will be opening the surrounding 2-, 4-, 10+-acre parcels to more intense densities based on the justification that the project is at village densities, and the up-zoning of surrounding property would be a consistent 'feathering' of the higher village densities of the project outwards. It sounds circular. And, it is. The County Community Development Model requires higher densities at a village core with gradually decreasing densities as one moves to the periphery of the village. Of course, this project is not consistent with the Community Development Model itself. Dropping such a large, urban development into rural, agricultural land, which is itself the periphery of the Valley Center and Bonsall communities, defeats the concept of concentrating density at village cores. By this logic, a so-called 'Community Development Model' community could be plunked down anywhere there are a few acres of agricultural land between existing communities, regardless of the disruption it causes to existing communities. "Communities," such as the one Accretive proposes to build, on valuable agricultural land where most of the infrastructure to sustain it will have to be built for the project, subverts the intent of the Model.</p> <p>The DEIR of July 2013 continues, "Approval of the Property Specific Requests could result in an increase of approximately 1598 dwelling units throughout the regional area. Therefore, the project's proposed density would not induce the growth in this portion of the county." First, basing a justification for not inducing growth on the prospect of an approval of the Property Specific Requests is fanciful. What if it is not approved? Will the project induce growth then? Second, there is no definition of what the "regional area" is, nor any analysis of how the possible addition of 1598 EDU would relieve the area surrounding this project from growth inducement. Are we to just take the County's word for it? Are not the Property Specific Requests merely an assault on the General Plan by the Board of Supervisors at the request of individual property owners trying to squeeze even more potential density out of properties designated for other uses by the consensus-built General Plan?</p> <p>In the RDEIR, "...growth inducement could occur if the project and all associated infrastructure improvements directly or indirectly remove obstacles to growth, or otherwise increase the demand for additional growth in the area around the project." If the project is approved, it will have the effect of removing the planning 'barriers' established in the General Plan and Valley Center and Bonsall Community Plans that</p>	<p>C1c-200 cont.</p> <p>C1c-201</p> <p>C1c-202</p> <p>C1c-203</p> <p>C1c-204</p> <p>C1c-201 The commenter broadly questions project consistency with the General Plan. Please refer to response to comment C1c-2 and to Appendix W for a thorough discussion of this topic. The commenter broadly questions project consistency with the Community Development Model. Please refer to response to comment C1c-13 and to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic.</p> <p>C1c-202 and C1c-203 The FEIR has been revised to reflect that the project could be growth inducing. See subchapter 1.8.5. The FEIR acknowledges that the intensification of land uses on-site resulting from the change in designation from "Semi-Rural" to "Village," which would result in an increase in allowable dwelling units from approximately 110 to 1,746 could encourage similar intensification and conversion of land uses in the immediate project vicinity. (FEIR, pp. 1-46 and 1-48) As a result, the FEIR reports that the project could have the potential to result in adverse physical environmental effects, including impacts to visual resources, air quality, biological resources, cultural resources, and noise. (FEIR, p. 1-49) While not expressly listed, it is evident from the analysis that the referenced intensification of land uses in the immediate project vicinity potentially would impact current agricultural resources, as such uses potentially give way to residential uses. However, as the FEIR analysis properly concludes, such potential impacts are too speculative for evaluation at this time because the specific nature, design, and timing of future projects is unknown, and any potential impacts would be evaluated at the time the future projects are identified and processed. (FEIR, p. 1-49)</p> <p>C1c-204 The FEIR analysis of potential growth-inducing impacts adequately acknowledged the project's potential growth-inducing effect on agricultural resources. The FEIR addresses the intensification of land uses on the project site that would result from project development and whether such intensification would encourage substantial economic or population growth, or the construction of additional housing in the surrounding area, either directly or indirectly. (FEIR, p. 1-46) As a result of this growth, the FEIR concludes that "the intensification of land uses on-site could encourage intensification in the immediate project vicinity. As more intense uses are developed</p>
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	<p>C1c-204 (cont.)</p> <p>on-site, existing adjacent less intense or vacant lands may be encouraged to intensify.” (FEIR, p. 1-46.) Thus, as stated in comment C1c-203 above, the FEIR acknowledges that the intensification of land uses on-site resulting from the change in designation from “Semi-Rural” to “Village,” which would result in an increase in allowable dwelling units from approximately 110 to 1,746 could encourage similar intensification and conversion of land uses in the immediate project vicinity. (FEIR, pp. 1-46 and 1-48) As a result, the FEIR reports that the project could have the potential to result in adverse physical environmental effects, including impacts to visual resources, air quality, biological resources, cultural resources, and noise (FEIR, p. 1-49) While not expressly listed, it is evident from the analysis that the referenced intensification of land uses in the immediate project vicinity potentially would impact current agricultural resources, as such uses potentially give way to residential uses. However, as the FEIR analysis properly concludes, such potential impacts are too speculative for evaluation at this time because the specific nature, design, and timing of future projects is unknown, and any potential impacts would be evaluated at the time the future projects are identified and processed. (FEIR, p. 1-49) Specific to agricultural resources, while growth in the surrounding areas may be encouraged due to the intensification of uses on the project site, it is speculative to assume that such future development would occur on (i.e., convert) Prime or Farmland of Statewide Importance, the two relevant soil classifications. (See County Guidelines, p. 40) Accordingly, even if agricultural resources were expressly referenced in the FEIR text, such potential impacts, like the other impacts, are too speculative to identify, at this time.</p>
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reserved the Project site for agricultural use at the periphery of those two village centers. Once village densities are inflicted on the Project site, the surrounding parcels would likely be eligible for higher densities as well, in order to match or gradually transition to less than the adjacent village density. Further encroachment would justify additional development using the high densities in the adjacent village. Neither the Project nor the induced-growth it will cause are needed to augment the County's housing inventory. The General Plan already provides enough opportunity for development to address expected population increases, and it does it in a way that preserves productive agricultural land, fulfilling another of the General Plan's land use goals.

C1c-204 cont.

The Project fails to meet the criteria of a village as defined in the General Plan. It is neither compact [generally 2-miles long by 1-mile wide] nor is it, "...where a higher intensity and a wide range of land uses are established, or have been planned." The General Plan and community plans recognize the Project site as low-density agricultural land and designate it to remain that way.

C1c-205

**1.8.2 Growth Inducement Due to Construction of Additional Housing**

The RDEIR's discussion of housing trends is irrelevant to the discussion of growth inducement. The General Plan Update of 2011 [the presently approved General Plan] has already projected a 'fair share' of growth for both the Bonsall and Valley Center communities. Both of these communities will grow, according to the General Plan, at dramatically higher rates than the rest of the County between now and 2050. However, the Project under consideration here is not a part of that projection and, therefore, is not needed, nor wanted, by either community in order to meet the 2050 General Plan build out. Why hasn't this project been relocated to the village core of either Bonsall or Valley Center or, even better, the Escondido downtown SPA? The village cores are planned for such growth. This project flouts those plans and the logic of the Community Development Model.

C1c-206

Housing trends are something that the development industry views in order to build houses that will sell more easily. Land use planning isn't the same thing. Rather than rearranging land use designations and upending the General Plan, the applicant should have designed their project for land with appropriate existing land use designations.

C1c-207

The notion that the 90,000 square feet of commercial space could cause the construction of additional housing, that would benefit the workers employed in that commercial space, is a fatuous one. First, given the likely high costs of constructing the Project, few if any of the retail employees being considered will be able to afford to live within the Project. More likely, those employees will come from far afield since the Project is so removed from other population centers where affordable housing is available. Of course, this will complicate Traffic and Green House Gas Impacts. It is also likely that the employees will not come from areas adjacent to the Project, since many of the neighboring property owners are retired or engaged in agriculture. And just as likely, the employees will not come from the ranks of the new residents of the Project as

C1c-208

C1c-205 The commenter questions project consistency with the General Plan. Please refer to response to comment C1c-13 and to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic.

C1c-206 The commenter makes a statement about the project in relation to SANDAG regional growth forecasts and planning efforts. Please refer to comment C1c-6. The commenter also raises concern about the designation of a new village in the Valley Center Community Planning area where two other villages already exist. Please refer to response to comment C1c-14 for a thorough discussion of this topic. With respect to the reference that the Downtown Escondido Specific Plan please see response to comments C1s-11 and C1s-12 (VCCPG-Alternatives 2013 letter).

C1c-207 The County acknowledges your comment and opposition to the project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

C1c-208 The FEIR has been revised to reflect that the project could be growth inducing. See subchapter 1.8.5. The FEIR concludes that "the intensification of land uses on-site could encourage intensification in the immediate project vicinity. As more intense uses are developed on-site, existing adjacent less intense or vacant lands may be encouraged to intensify." (FEIR, p. 1-46.) Thus, the FEIR acknowledges that the intensification of land uses on-site resulting from the change in designation from "Semi-Rural" to "Village," which would result in an increase in allowable dwelling units from approximately 110 to 1,746 could encourage similar intensification and conversion of land uses in the immediate project vicinity. (FEIR, pp. 1-46 and 1-48) As a result, the FEIR reports that the project could have the potential to result in adverse physical environmental effects, including impacts to visual resources, air quality, biological resources, cultural resources, and noise. (FEIR, p. 1-49)

<p>they will probably not be willing to work at jobs paying minimum or slightly higher hourly wages.</p> <p>To speculate on where retail employees will originate is conjectural in the extreme and not worthy of inclusion in a discussion of growth inducement. Since the County conclusions for this section cite that speculation on 'potential' impacts do not comport with CEQA Guidelines for evaluation in this RDEIR, why are we talking about employee origins? How many employees could there be in 90,000 square feet of commercial space? How likely is it that employees will rush to build a house next to the Project so they can work at a minimum-wage job?</p> <p><b>1.8.3 Construction/Improvement of Roadways</b></p> <p>In most instances, the Project's proposed roadway improvements will not be growth inducing. In fact, they will not even support the Project's proposed 5,185 residents. None of the Project's road construction or existing road improvements is designed to do much more than save the applicant money. The applicant has asked for 10 road standard modifications that will lower the capacity and/or design speed of existing public roads [with no consequent benefit to the public] or confiscate private roads through the County's use of eminent domain to benefit, not the public, but the needs of the applicant's Project. Section 1.8.3 suggests that the applicant wants to improve Mountain Ridge Road to County private road standards with a gated entry system to minimize through traffic. However, in other sections of this RDEIR, the applicant is optioning Mountain Ridge Road as a fully public road that would have to be seized using the County's eminent domain authority in a way that harms existing easement owners for the benefit of the applicant's Project. One proposal would put a fire station along Mountain Ridge Road as a public road. So, through traffic would likely be dramatically increased along roadways not built to handle such excessive loads.</p> <p>And, as the RDEIR concludes, the "... proposed on-site circulation plan and off-site road improvements would not result in removal of a barrier to additional growth in the area," but, instead would add impediments to efficient and safe transit for all residents in the Bonsall/Valley Center area.</p> <p><b>1.8.4 Extension of Public Facilities</b></p> <p>The Project will require the "extension" of several public services. While water for irrigation of the presently agricultural land within the Project can be converted for the Project's use, there is no existing sewer infrastructure on or near the site. The applicant is asking for a possible package plant on-site with possible connections to the Lower Moosa Canyon Water Treatment Facility some distance away. That facility will have to be upgraded substantially to tertiary treatment standards to furnish the needs of the Project. The upgrade will require a new permit from the Regional Water Quality Control Board. Growth would be induced by such an enlargement of and upgrade to the facility, which would then be available to handle a much higher volume and could accommodate a higher density of clients along the route of the proposed pipeline from the Project.</p>	<p>C1c-208 cont.</p> <p>C1c-209</p> <p>C1c-210</p> <p>C1c-209 Regarding growth inducement, the FEIR in subchapter 1.8 analyzes various factors, including project density, additional housing, roadway construction, public facilities, fire and emergency services, schools, and water and wastewater services, and concludes the project could be growth inducing due to the intensification of uses on-site, lower fire response times to the vicinity, and expansion of water and sewer infrastructure. The project would make improvements to existing off-site roads, but would not add additional travel lanes or construct new roads to serve undeveloped areas. Road improvements would be made to the degree needed to support direct and anticipated cumulative traffic. Therefore the project's proposed on-site circulation plan and off-site improvements would not result in the removal of a barrier to additional growth.</p> <p>With regard to the exceptions being requested for the roadway improvements, these exceptions were included as part of the project's circulation design and analyzed in FEIR subchapter 2.3. The purpose of the exceptions requests are not to facilitate the project at a lower cost, rather they are largely to avoid impacts to surrounding properties and to support traffic calming measures. Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that overall the road network design for the project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant. The decision making body will decide whether to grant all or some of the exception requests as part of the approval process.</p> <p>With respect to growth inducement from the redesignation of Mountain Ridge Road as a public road, this is discussed in FEIR Subchapter 4.9.1.7. The FEIR discloses that the alternative would potentially induce growth due to improved fire and emergency services and the expansion of sewer and water infrastructure. However, the environmental impacts that may result from growth inducement are too speculative to address due to the unknown nature, design, and timing of future projects. In accordance with CEQA Guidelines Section 15145, such impacts are not addressed further herein, but would be required to be addressed at the time future projects are identified and processed. See also the response to comment O3g-7.</p>
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	<p>C1c-209 (cont.) The balance of the comment expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. See also comment C1c-173.</p> <p>C1c-210 The growth inducing impact discussion contained in FEIR subchapter 1.8 has been revised from the previous draft EIR. Potential for growth inducement associated with an on-site WRF is discussed in FEIR subchapter 1.8.4.3. The FEIR concludes that while the project proposes facilities sized only to meet the requirements to serve the project, VCMWD could decide to improve facilities and/or increase capacity after project approval. Therefore, the on-site WRF could remove barriers to future growth.</p>
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The project, if approved, will be a part of the Valley Center Parks and Recreation District. Although the Project is presently offering one public park site, which could be dedicated to the district, the balance are smaller and scattered within various Project phases and would remain private. To the extent that the Project offers public events at the public park that attract the attention and interest of off-site crowds, it would potentially be growth inducing.

C1c-211

**1.8.4.1 Fire/Emergency Services**

Although the applicant has proposed several options for fire service [just pick one!], none of the options is feasible for or satisfactory to the Deer Springs Fire Protection District Board of Directors. The Project, by itself, will not generate sufficient funds to operate a new station at any location within or near the Project. Moving an existing station to a new location within the Project would jeopardize a significant part of the mission of DSFPD, and it is unacceptable to existing residents. There would have to be additional density off-site to help pay the cost of an additional fire station. That additional density would likely be induced growth.

C1c-212

Did the 'will serve' letters, from the public agencies cited, all agree to provide immediate access to the cited services? What kinds of conditions did the public agencies require to provide service? Have those conditions been met by the Project?

**1.8.4.2 New Schools**

Curiously, the RDEIR discussion of the provision of a new school site within the Project site is made to sound as if it solves a service problem that the Project itself will create if approved. One would think that adding potentially hundreds of children to the Valley Center Pauma Unified School District [VCPUSD] would require expansion. However, VCPUSD has a vacant school in the North Village of Valley Center. The district wouldn't be able to get state funds to purchase the site and build a new school until the vacant school is fully utilized. The SB 50 fees mentioned would not be sufficient to meet the costs of a new school [a dilemma that sounds remarkably similar to the fire service dilemma of needing more growth to meet costs of extending services].

C1c-213

The school site offer is uncertain in terms of the length of time the offer remains in effect, and it allows that if one or the other of two districts doesn't accept the offer, the applicant will withdraw the offer and make the acreage available for other unspecified purposes. It doesn't take a genius to understand that the school site offer is of little value to the school districts at this point. However, despite the unused school capacity within the VCPUSD school district, the applicant is proposing a new school which will induce growth at the farthest boundary of the district. How is this not growth inducement? If this project were being proposed at the Valley Center North or South Village, the unused school would likely handle the surge of enrollment from the project without adding a new school. Why isn't the County encouraging the applicant to

C1c-214

C1c-211 The commenter questions the adequacy of the analysis of growth inducing impacts for its alleged failure to deem as growth inducing members of the public attending public events in the project's public park. The FEIR in Subchapter 1.8 analyzes various factors, including project density, additional housing, roadway construction, public facilities, fire and emergency services, schools, and water and wastewater services, and was revised to conclude that the project could be growth inducing due to the intensification of uses on-site, lower fire response times to the vicinity, and expansion of water and sewer infrastructure. However, the public park would be constructed to support the residents of the project and would be constructed to meet the needs of project residents. Any public events held at such park would be temporary in nature and, therefore, would not be growth inducing.

C1c-212 The commenter questions the adequacy of the analysis of growth inducing impacts for its failure to include the provision of fire services. As discussed in response to comment C1c-210, subchapter 1.8 of the FEIR was revised to conclude that the project could be growth inducing based on a variety of factors, including fire protection services. However potential impacts are too speculative for evaluation in this FEIR because the specific nature design and timing of future project sis unknown at this time.

C1c-213 to C1c-214 The commenter questions the adequacy of the analysis of growth inducing impacts for its failure to deem as growth inducing the provision of a school. As discussed in response to comment C1c-210, although subchapter 1.8 was revised it still concludes that the project's dedication of a school site and the construction of a school by the district would be growth accommodating and not growth inducing.

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<p>relocated its project to one of the village cores where school capacity already exists? Would not building an unneeded school on the project site induce surrounding growth that could take advantage of a new school while leaving unused capacity in the village core?</p> <p>So, no new schools are likely to be built immediately, and thus, no growth inducement from new schools? If the Project is approved and it does induce more growth around its periphery as expected, it will result at some point in requiring a new school and that would be growth inducing. However, initially, the community will have to adjust to bussing the students across the length of Valley Center over narrow winding roads fit for rural land uses until the existing school is fully utilized. Instead of being a solution, it will add to traffic congestion at peak hours, add to Green House Gas Emissions, add to the cost of bussing for the district and cause a considerable reshuffling of the student assignments to the Lilac School and the Valley Center Elementary School. All of this occurs because the Project is proposed for an inappropriate site that lacks the necessary infrastructure to sustain it.</p> <p><b>1.8.4.3 Water and Wastewater Growth Inducement</b></p> <p>The County makes the Statement that the Project is a part of an existing Sewer Service Area. Please provide a copy of a current map that depicts the Project as part of the current Lower Moosa Sewer Service Area. Growth Inducement Ch 1.8.4.3 – The County’s statement below from page 1-48 is misleading and lacks disclosure of several relevant facts:</p> <p><i>“Likewise, the Lower Moosa Canyon WRF is operating under an existing MUP that would accommodate modifications to allow wastewater from a maximum of 1,250 equivalent dwelling units to be treated.”</i></p> <p>There are several misleading statements in this incomplete statement that the County has made or inferred here:</p> <p>1). While the County issued in 1996 a Major Use Permit for the Lower Moosa Water Reclamation Facility (LMWRF) expansion, having an approved MUP is not the only permit required. The facility does not have a permit from the San Diego Regional Water Quality Control Board (SDRWQCB) for implementing this expansion, which is a large undertaking. Obtaining this permit approval take a great deal of time and will likely require the entire LMWRF to be upgraded to current Title 22 tertiary water treatment standards. Upgrade of the LMWRF likely will have Environmental Consequences far different than those assessed in 1996. The existing as built configuration of LMWRF will accommodate an approximate 450 additional equivalent dwelling units [EDU] at the current disinfected secondary treatment level of the plant. And there are other competing users for service. The Project does not have sole claim for all existing capacity. The County has not demonstrated that Sewer Service can be provided for the proposed</p>	<p>C1c-214 cont.</p> <p>C1c-215</p> <p>C1c-216</p> <p>C1c-217</p> <p>C1c-215 The commenter raises concerns about project impacts to traffic and GHG if a school is not built on the project site and children are instead bussed to local schools. Traffic impacts associated with the school use are accounted for in the Traffic Impact Study prepared for the FEIR (see Appendix E). Assumptions are based on trip generation rates for the proposed Lilac Hills Ranch project were developed utilizing SANDAG’s Guide to Vehicular Traffic Generation Rates for the San Diego Region (SANDAG, April 2002). Specifically, Table 4.8 of the Traffic Study identifies the project trip generation for Phase E, which includes a proposed elementary and middle school. As the proposed on-site K-8 school is intended to serve the Lilac Hills Ranch project, a majority of the traffic generated by the school would be internal trips which would not leave the project site. As the school would serve the community, extensive use of buses on surrounding roadways is not anticipated.</p> <p>Section 12.0 of the traffic study contains an analysis of the project impacts assuming a school is NOT built on the site. Since this alternative will result in school related trips associated with the site needing to leave the site, an analysis of the impact of these extra trips was conducted. Section 12.2 of the traffic study is a summary of the analysis results and Table 12.3 summarizes the area intersection operations if the school is not constructed on the site. Table 12-3 shows that adequate LOS C or better operations are calculated and no additional mitigation would be necessary under this alternative. As stated in the October 30, 2014 letter to Mark Slovick, the Bonsall Unified School District is interested in the project’s school site for a possible location to operate a new school. See also response to comment C1g-61.</p> <p>Traffic impacts associated with the school use (should the school not be built) are accounted for in the projects Traffic Impact Study (FEIR Appendix E).</p>
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	<p>C1c-216 The commenter raises concerns about the project water and wastewater infrastructure being growth inducing. The project is located within existing water and sewer boundaries as plainly disclosed in the FEIR, Subchapter 1.8.4., p, 1-47 and the Specific Plan, Part I.E.2.</p> <p>C1c-217 It is acknowledged that all the permits and issues listed would need to be addressed by VCMWD to enable the expansion of the Lower Moosa Water Reclamation Facility as a possible wastewater treatment option for the project. If these permits cannot be obtained to the satisfaction of the regulatory agencies then the project would proceed with one of the other methods for treatment and disposal of wastewater as directed by VCMWD. Any expansion at the LMWRF beyond its current capacity would include the addition of tertiary treatment facilities to allow for recycled water use as a means of effluent disposal. As discussed in the FEIR subchapter 3.1.7.2, two options for wastewater treatment for the project would not require increased capacity for the LMWRF as such treatment would occur onsite.</p>
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Project in the time frames that the Lilac Hills Ranch Project requires service, nor has it quantified the Environmental Impact of providing Sewer service.

C1c-217  
cont.

2). The Project claims service capacity for 1250 EDU's of the Project. As stated without considerable qualifiers, this statement is not true. It assumes improvements to LMWRF that are not currently in place. Please list the other planned Projects besides Lilac Hills Ranch that require LMWRF service and accurately restate the net available service for the Project based on today's as built physical plant and treatment standards.

C1c-218

**GROWTH INDUCEMENT**

In 2014, the County, who is Lead Agency for the Lilac Hills Ranch Project, finds that the expansion of LMWRF to not be growth inducing.  
In 1996, the County sent in Public Comments to Lead Agency Valley Center Municipal Water District that the expansion IS growth inducing (Pages 131 to 133 of the 1996 EIR provided by the County)  
The County stated on June 20, 1996:

C1c-219

*"GROWTH INDUCEMENT  
It is clear that the proposed project is growth inducing. In fact CEQA Section 15126 g. uses a wastewater treatment plant as an example of a project that would allow for more construction, i.e. is growth inducing. Also, CEQA identifies projects that will remove obstacles to population growth as growth inducing. Thus the RDEIR must comply with CEQA §15126 g. The current draft does not comply with these requirements."*

Please answer why Sewer Expansion to LMWRF caused by Lilac Hills Ranch is not Growth Inducing, as the County found it to be in 1996?

**1.8.6 Conclusion**

The RDEIR sees this project as an island of self-sustaining residential and commercial uses that is removed from the necessity of engaging the world outside its boundaries. This arm's length existence will keep the surrounding properties, which are largely agriculture-oriented, from experiencing the pressure to rezone to complement the proposed project village densities. Of course, this is a fantasy that would make Disney envious. The fact is, there is very little that makes this project self-sustaining in terms of jobs, consumer commercial opportunities, or infrastructure. Once in place, this project and its population will require greater commercial options, more infrastructure, better and more roads than are being planned, and more services.

C1c-220

The agricultural land uses surrounding the project will not be able to operate as efficiently with the scores of sensitive receptors presented by the project limiting processes and procedures that are essential for efficient and cost competitive operation. The inefficiencies resulting from the sensitive receptors and inadequate agricultural buffers for the project will incline the farmers to calculate the potential profit to be gained by changing the land use designation and densities for their properties and to sell out.

C1c-221

C1c-218 The proposed project is located in the VCMWD which is the service provider for the project. The County of San Diego Board of Supervisors Policy I-84 requires the submittal of a Project Facility Availability form from the facility provider, indicating whether the facility provider can potentially provide facilities to serve a project. The forms also allow facility providers to recommend specific requirements that may be made conditions of project approval. The VCMWD has provided Project Facility Availability Forms from the VCMWD for both sewer and water, which indicate that the project is in the district and eligible for service and facilities are expected to be available within the next 5 years.

As stated in FEIR subchapter 3.1.7, should either on-site treatment alternative (Alternative 1 or Alternative 2) be the selected alternative, the initial development within the project may be provided sewer service by means of trucking sewage from a collection point on-site to an existing wastewater treatment plant. This would be a temporary approach to allow sufficient wastewater flows to accumulate prior to the operation of a treatment plant. Trucking of sewage would be required for up to the first 100 homes (approximately three truck trips per day) to allow for a sufficient minimum flow to operate the facility. Temporary trucking under Alternative 1 or Alternative 2 would add three trips per day to the road system and would cease when the minimum flow (first 100 homes) necessary for operation was reached. Treated effluent would not be trucked back to the project. The decision about which alternative will be used is the jurisdiction of the VCMWD. The impacts of all alternatives are addressed in FEIR subchapter 3.1.7.

The VCMWD Board approved Preliminary Concept Approval to the project June 3, 2013. Part of the approval outlines a plan to providing wastewater treatment whereby the initial phase of LHR expands the Lower Moosa facility and a smaller on-site facility is constructed based on the needs of LHR and the Lower Moosa service area.

The WTF would be constructed upon the time its requirement is necessary to serve the residents of the project. Details relating to the level of sewer treatment for each alternative, including disposal of solids is discussed in FEIR subchapter 3.1.7.

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	<p>C1c-219 As discussed above, Subchapter 1.8 of the FEIR was revised to conclude the project could be growth inducing based upon the expansion of water and sewer infrastructure to serve the project site because VCMWD could decide to increase capacity at the Lower Moosa Canyon WRF and remove a barrier to additional growth in the area. However, pursuant to CEQA Guidelines 15145, potential impacts are too speculative for evaluation in this EIR because the specific nature, design and timing of future projects is unknown at this time.</p> <p>C1c-220 The County acknowledges your comment and opposition to the project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p> <p>C1c-221 Please refer to comment C1c-108 and C1c-204.</p>
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LETTER

RESPONSE

<p>That is growth inducement.</p> <p>The RDEIR conclusion #5 states, “The project would not result in growth inducement due to provision of public facilities. The availability of a new school site would assist the district in meeting the student enrollment demands created by the project. The proposed parks are designed to comply with state and County requirements and to serve the proposed population generated by the project.” This is laughable.</p> <p>As CEQA §15126.2 (d) notes, the addition of public facilities, such as a new school, will induce growth surrounding the new facility by removing a barrier to growth. Suggesting that a new school would only accommodate the growth caused by the applicant’s Project is naïve at best.</p> <p>The community understanding of adding new parks as a condition of development is that the new parks will benefit the entire community and any growth anticipated in the Valley Center Community Plan and SD County General Plan. To say that new parks would merely satisfy the state and county requirements for the proposed population of the project misses the point of requiring parks development with new development. A community with new parks and trails is more attractive to prospective homebuyers and therefore growth inducing.</p> <p>The Lower Moosa Canyon WRF has been shown to lack the capacity to accommodate the project effluent without expansion and upgrading. These expansions and upgrades are growth inducing, in that they will allow this Project to be built. Once upgraded and expanded for this Project, further additions of EDU will be more possible and thus, growth inducement continues. Could the County explain, again, how this scenario is not growth inducing?</p> <p>The final paragraph of the conclusions in 1.8.5 seems to make the case that the Project will potentially cause, through the induced growth of future projects, additional adverse physical environmental effects. Those impacts would be to visual resources, air quality, biological resources, cultural resources, and noise [although significant traffic concerns are missing]. These are the same impacts noted in this RDEIR for the present Project. However, the County goes on to say that they cannot speculate on the impacts of unknown future projects that may be induced by the approval of the present Project according to CEQA. It would be speculative. It seems that speculating on the potential environmental impacts, including growth inducement, in this RDEIR is acceptable [very little data is presented to make any conclusions other than speculative ones about the impacts to visual resources, air quality, biological resources, cultural resources, and noise], but speculation about growth induced environmental impacts resulting from future projects is too risky.</p> <p>In conclusion, besides being unnecessary growth that is outside the needs expressed in the General and Community Plans through the year 2050, this Project will, indeed, be growth inducing. If approved, this Project will be cited by future projects proposed for its borders and environs as justification for extension of urban densities in the rural areas</p>	<p>C1c-221 cont.</p> <p>C1c-222</p> <p>C1c-223</p> <p>C1c-224</p> <p>C1c-225</p> <p>C1c-226</p> <p>C1c-222 Please refer to comment C1c-213.</p> <p>C1c-223 The commenter questions the adequacy of the analysis of growth inducing impacts for its alleged failure to include the project’s public park in growth inducing discussion. The FEIR in subchapter 1.8 analyzes various factors, including project density, additional housing, roadway construction, public facilities, fire and emergency services, schools, and water and wastewater services, and was revised to conclude that the project could be growth inducing due to the intensification of uses on-site, lower fire response times to the vicinity, and expansion of water and sewer infrastructure. However, the public park would be constructed to support the residents of the project and would be constructed to meet the needs of project residents. The County can require the development project to provide public park lands only in relation to the demand that is generated by that project.</p> <p>C1c-224 Please refer to comment C1c-119.</p> <p>C1c-225 The commenter questions the adequacy of the FEIR analysis with respect to growth inducing impacts. As discussed above, Subchapter 1.8 of the FEIR was revised to conclude that the project could be growth inducing due to the intensification of uses on-site, lower fire response times to the vicinity, and expansion of water and sewer infrastructure. Please refer to responses to comments C1c-206 through C1c-225.</p> <p>C1c-226 The comment expresses the opinions of the commentator regarding potential growth inducing impacts. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p>
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LETTER

RESPONSE

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of Valley Center and Bonsall. In fact, this Project's Specific Plan cited the presence of several other clustered developments north and south of its location along the I-15 corridor as a legitimate, consistent basis for approving the Lilac Hills Ranch project.

Yes, this is how growth inducement works.

And the County finds no Growth Inducement?

} C1c-226  
cont.

# 388/389 Escondido to Pala

M-F • SA • SU • H

**Destinations/Destinos**

- Palomar College Escondido Branch
- Regal Cinemas
- Palomar Medical Center
- Harrah's Rincon Casino
- Pala Casino
- Casino Pauma
- Valley View Casino
- East Valley Community Center
- Highway 76 Park and Ride



**388/389** | **Escondido to Pala**

**Bold denotes P.M. times/Horarios en negritas son en la tarde**

<b>388 Monday - Sunday</b>						
Northbound to Pala via Valley Center						
Escondido Transit Center	Valley Pkwy. & Midway Dr.	Valley Center Rd. & Cole Grade Rd.	Valley View Casino	Harrah's Rincon Casino	Casino Pauma	Pala Casino
<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>
5:03	5:17	5:33	5:44	5:53	6:07	6:28a
7:03	7:18	7:38	7:50	8:01	8:16	8:46
9:03	9:18	9:35	9:48	10:02	10:22	10:52
11:03	11:20	11:39	11:52	<b>12:03</b>	<b>12:23</b>	<b>12:48p</b>
<b>1:03</b>	<b>1:21</b>	<b>1:40</b>	<b>1:53</b>	<b>2:04</b>	<b>2:23</b>	<b>2:50</b>
<b>3:03</b>	<b>3:21</b>	<b>3:39</b>	<b>3:53</b>	<b>4:05</b>	<b>4:22</b>	<b>4:49</b>
<b>5:03</b>	<b>5:23</b>	<b>5:42</b>	<b>5:54</b>	<b>6:05</b>	<b>6:22</b>	<b>6:49</b>
<b>7:03</b>	<b>7:23</b>	<b>7:42</b>	<b>7:54</b>	<b>8:05</b>	<b>8:20</b>	<b>8:44</b>

<b>388 Monday - Sunday</b>						
Southbound to Escondido via Valley Center						
Pala Casino	Casino Pauma	Harrah's Rincon Casino	Valley View Casino	Valley Center Rd. & Cole Grade Rd.	Valley Pkwy. & Midway Dr.	Escondido Transit Center
<b>7</b>	<b>6</b>	<b>5</b>	<b>4</b>	<b>3</b>	<b>2</b>	<b>1</b>
7:05	7:25	7:46	8:03	8:12	8:32	8:44a
9:05	9:25	9:46	10:03	10:12	10:32	10:44
11:05	11:25	11:46	<b>12:03</b>	<b>12:12</b>	<b>12:32</b>	<b>12:44p</b>
<b>1:07</b>	<b>1:28</b>	<b>1:48</b>	<b>2:05</b>	<b>2:14</b>	<b>2:36</b>	<b>2:50</b>
<b>3:05</b>	<b>3:25</b>	<b>3:45</b>	<b>4:01</b>	<b>4:11</b>	<b>4:32</b>	<b>4:46</b>
<b>5:04</b>	<b>5:26</b>	<b>5:47</b>	<b>6:01</b>	<b>6:10</b>	<b>6:34</b>	<b>6:48</b>
<b>7:03</b>	<b>7:21</b>	<b>7:41</b>	<b>7:56</b>	<b>8:05</b>	<b>8:27</b>	<b>8:38</b>
<b>9:03</b>	<b>9:22</b>	<b>9:42</b>	<b>9:59</b>	<b>10:08</b>	<b>10:30</b>	<b>10:39</b>

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**388/389** | **Escondido to Pala**

**Bold denotes P.M. times/Horarios en negritas son en la tarde**

<b>389 Monday - Sunday</b>		
Northbound to Pala via Interstate 15		
Escondido Transit Center	Highway 76 & Interstate 15	Pala Casino
<b>1</b>	<b>8</b>	<b>7</b>
6:03	6:31	6:53a
8:03	8:31	8:53
10:03	10:31	10:53
<b>12:03</b>	<b>12:34</b>	<b>12:55p</b>
<b>2:03</b>	<b>2:32</b>	<b>2:53</b>
<b>4:03</b>	<b>4:33</b>	<b>4:52</b>
<b>6:03</b>	<b>6:33</b>	<b>6:51</b>
<b>8:03</b>	<b>8:32</b>	<b>8:52</b>

<b>389 Monday - Sunday</b>		
Southbound to Escondido via Interstate 15		
Pala Casino	Highway 76 & Interstate 15	Escondido Transit Center
<b>7</b>	<b>8</b>	<b>1</b>
7:05	7:18	7:45a
9:05	9:17	9:44
11:05	11:18	11:46
<b>1:07</b>	<b>1:20</b>	<b>1:47p</b>
<b>3:05</b>	<b>3:18</b>	<b>3:45</b>
<b>5:04</b>	<b>5:17</b>	<b>5:44</b>
<b>7:03</b>	<b>7:17</b>	<b>7:42</b>
<b>9:04</b>	<b>9:18</b>	<b>9:43</b>

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