

*and an additional gated emergency ingress/egress via Mountain Ridge Road and Rodriguez Road. Mountain Ridge Road is accessed from Circle R Road, and Rodriguez Road is accessed via Covey Lane."*

This statement infers that Rodriguez Road is used for internal circulation of the Project. It is also inconsistent with the Evacuation Route Map on Page 16 of the May (no date) 2014 revision to the Evacuation Plan.

Mountain Ridge Private road and Covey Lane appear to be used as internal circulation roads for some mysterious and confusing portions of the Proposed Project. The Project represents that it intends to use Rodriguez Road exclusively for Emergency Access. However, there are conflicting statements made throughout the EIR regarding the Project's use of all three of these private roads.

Please specifically state in an accurate and complete manner the Project's use of Covey Lane, Mountain Ridge, and Rodriguez Road for purposes of the Project, including a straightforward thorough explanation of the use of gates to limit access to some roads. Demonstrate that whatever usage of these roads is correctly reflected throughout all REIR Project documentation.

**2.7.3.5. – Vectors**

The RDEIR reports,

*"Based on the County's Guidelines for Determining Significance – Vectors (San Diego County 2009b), a significant impact would occur if the project substantially increased human exposure to vectors capable of spreading disease by:*

*b. Proposing a vector breeding source, including but not limited to, composting or manure management facilities, confined animal facilities, animal boarding/breeding/training operations"*

The RDEIR goes on to say that the Project would not involve any manure management or manure management facility. And yet, the Wastewater Reclamation Facility [WRF] will have standing water stored in hydro-modification ponds that could facilitate breeding of mosquitoes. Further, the preliminary screening process will remove human manure from the influent sewage and place it into a storage bin that would be removed only two or three times a week.

While the RDEIR asserts that the applicant will take measures to reduce the storage bin's attraction to flies, rodents and other vectors, it doesn't elaborate on what those measure would be.

Is it too preliminary to ask how the applicant will control vectors among the storage bins at the WRF?

And, what measures would be implemented to control vectors during the transfer of the bins off-site for disposal?

What are the assurances that the measures taken would be effective?

This is particularly interesting considering the proximity of the school site to the WRF [within

C1d-160, cont.

C1d-161

C1d-162

C1d-163

C1d-161 Portions of Covey Lane and Rodriguez Road currently extend into the project site, and Mountain Ridge Road is proposed to be extended into the project site. As shown in FEIR Figure 1-7, the portions of these roadways within the project site would be used for internal project circulation. The off-site portions of Rodriguez Road and Mountain Ridge Road would only be used by the project for emergency access and access would be limited via on-site gates (see "restricted access points" on Figure 1-7). The off-site portion of Covey Lane that extends between the project boundary and West Lilac Road would be improved to public road standards and would be used for both public and emergency access.

C1d-162 Refer to response C1d-142 above. The FEIR correctly identifies the usage of these roadways. Due to the lack of specificity of this comment, it is unclear where the reader is requesting further clarification and no additional response can be provided.

C1d-163 Wet weather storage ponds typically do not have mosquito vector problems. This is because they normally do not contain water during the spring, summer, or fall. During dry winters they may not even contain water. They are used for water storage during wet weather periods. If needed, a temporary spray recirculation system would be placed on the pond to eliminate vector issues. Refer to FEIR Appendix L.

As detailed in the plan, screened material shall be removed from the facility two to three times per week. The screening process would take place indoors, with screened material disposed of in a commercial dumpster that would be housed indoors until transported off-site. Routine removal of material would minimize fly attraction/propagation. The comment raises a concern about potential vectors that could be generated during the transfer of storage bins to an off-site location. However, as the screening and storage would take place indoors and material would be enclosed in a commercial dumpster that would be fully enclosed, the transport of this material to an off-site location would not result in vector breeding.

686-feet]. These potential impacts are judged less than significant only if all protocols are followed routinely.

**2.8 Noise**

In General, RDEIR Subchapter 2.8 Noise the County of San Diego factually understates Significant Impacts and offers ineffective Mitigation of the Noise Impacts that the County concedes are Significant.

**Comment 2.8-1: THE COUNTY'S NOISE STUDY DOES NOT ASSESS THE IMPACTS TO EXISTING OFF SITE RESIDENTIAL STRUCTURES**

The RDEIR Noise Study Chapter does not reasonably disclose factual impacts to the existing residential housing located off Mountain Ridge Private Road and other offsite existing residential structures at other locations.

The modeled results in Table 12 of Appendix M, Noise Report for APN 129-430-13 (Receptor R-150), conflict with the 60 and 65 CNEL noise contour presented in FIGURE 6-b in Appendix M. We challenge the County's representation that future cumulative noise level at 57 CNEL for location R-150, since the residence is in the path of the 65 CNEL contour in FIGURE 6-b.

Offsite noise contours need to be graphically disclosed in the RDEIR in a consistent manner with On-Site Noise Contours – refer to FIGURE 6-b from Appendix M- Noise Report. The County of San Diego has not fairly represented to the Public the Off-Site Noise Impacts of the Project upon existing Off-Site Residences in its RDEIR.

**Comment 2.8-2: THE COUNTY'S PROPOSED MITIGATION IS INEFFECTIVE IN MITIGATION OF IMPACTS TO EXISTING OFF-SITE RESIDENTIAL STRUCTURES**

The mitigations proposed by the County; Mitigations MN1 through 20 (excepting Impacts 3 and 17 which are admitted to be Unavoidable) are pedantic discussions that do nothing to mitigate the Noise Impacts evaluated as significant. A key theme of these laughable mitigations is future non-specific promises of performance for which there is no guarantee. Mitigation needs to be specific and certain.

The proposed Mitigations offer theoretical approaches, with no applied solutions that reduce noise below the thresholds of Significance.

Therefore, Impacts N-1, 2, 4, 5,6, 7,8, 9, 10, 11, 12, 13, 14, 15, 16, 18, 19, and 20 remain Significant and Unmitigated.

**Comment 2.8-3: THE COUNTY'S PROPOSED MITIGATION M-N-1 IS INEFFECTIVE**

How does the County propose to acquire "Noise Protection Easements" for the Project's Offsite Noise Impacts on (proposed) Covey Lane Public Road, Mountain Ridge Private Road, Rodriguez Private Road, West Lilac Public Road and Circle R Drive Public Road? We believe that this mitigation is infeasible and the Impacts remain Significant and Unmitigated.

**7.9 IRREVERSIBLE EFFECTS**

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

C1d-163, cont.

C1d-164

C1d-165

C1d-166

C1d-167

C1d-168

C1d-164 The noise analysis adequately assesses traffic noise impacts at existing off-site locations and fully discloses the potential noise impacts to off-site residences. Specific comments are addressed in the responses that follow.

C1d-165 Off-site impacts were fully assessed and disclosed in the FEIR. A graphic of the off-site areas is not necessary to determine or adequately disclose the off-site noise impacts. Please see FEIR subchapters 2.8.2.1 and 2.8.3.1 for additional information regarding the analysis of off-site noise impacts.

C1d-166 The County acknowledges the commenter's concerns regarding infeasible mitigation for off-site residences. Staff agrees with this comment because the applicant does not have the necessary off-site property rights and access to implement noise reducing measures to existing residences along Covey Lane and Lilac Hills Ranch Road. Although mitigation measures were discussed, noise impacts were determined to be significant and unmitigable as described in the FEIR subchapter 2.8.6.1. Additionally, please refer to Appendix M, Noise Report Section 2.3 and Tables 11 and 12 which identifies and describes noise impacts at off-site locations.

The County acknowledges the commenter's concerns regarding the proposed measures not mitigating significant noise impacts. Staff respectfully disagrees and describes the referenced mitigation measures below:

Mitigation measures M-N-1 and M-N-2 address on-site traffic-generated noise impacts (impacts N-1 and N-2). M-N-1 requires that prior to Final Map approval, the project applicant is to dedicate noise protection easements, which contain a restriction requiring compliance with the applicable County General Plan noise standards. As stated in the mitigation measure, potential feasible measures to achieve compliance include, but are not limited to, altering lot configurations and building locations, varying grading contours, and construction of noise barriers Related mitigation measure M-N-2 requires building permit level analysis demonstrating

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	<p>C1d-166 (cont.)</p> <p>that interior noise levels would not exceed applicable County noise standards. As previously noted, both M-N-1 and M-N-2, and all adopted mitigation measures, would be enforced by the County through adoption and implementation of a mitigation monitoring and reporting program. (See Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097.)</p> <p>Mitigation measures M-N-3 through M-N-7 address stationary noise impacts (impacts N-4 through N-10) and require implementation of best engineering practices, including consideration of the noise rating of selected equipment, equipment orientation and placement within the site, and site design, such as building placement and the use of terrain to shield adjacent properties from on-site noise generators.</p> <p>Mitigation measures M-N-8 through M-N-12 address construction noise and vibration impacts (impacts N-11 through N-16) and would reduce these impacts to less than significant by certain defined construction prohibitions and requirements to be implemented during construction activities, such as limiting construction equipment operations, installation of temporary noise barriers, establishing setback distances for rock crushing activities, and submittal of blast/drilling and monitoring plans . These measures would be enforceable through project conditions placed on Final Maps and grading permits.</p> <p>As disclosed in the FEIR, however, mitigation is infeasible as to the direct and cumulative off-site traffic-generated noise impacts, impacts N-3 and N-17, respectively, along Covey Lane and the future Lilac Hills Ranch Road; accordingly, these impacts would remain significant and unavoidable. (See FEIR subchapter 2.8.6.1.).</p> <p>Under CEQA, where the formulation of the precise means of mitigating impacts is infeasible or impractical, or where feasible mitigation measures are known, but practical considerations prohibit developing the specific measure during the planning process, the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval. The mitigation measures identified in the FEIR meet such requirement.</p>
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	<p>C1d-167 The County acknowledges the commenter's concerns regarding Noise Protection Easements for off-site receptors. Noise Protection Easements are required under mitigation measures M-N-1 and M-N-2 and would be a recorded easement on the project site and not at off-site locations. Mitigation measure M-N-1 is not intended to address off-site impacts but, instead, applies to impacts within the project site.</p> <p>As shown on Figure 6a and 6b within the Appendix M, Noise Report, all noise protection easements would only apply within the project boundaries and are not applicable to off-site locations.</p> <p>As disclosed in the FEIR, however, mitigation is infeasible as to the direct and cumulative off-site traffic-generated noise impacts, impacts N-3 and N-17, respectively, along Covey Lane and the future Lilac Hills Ranch Road; accordingly, these impacts would remain significant and unavoidable. (See FEIR subchapter 2.8.6.1.)</p>
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**2.9 Significant Irreversible Environmental Changes Resultant from Project Implementation – Comments**

The proposed Project [Lilac Hills Ranch] will, indeed, cause significant, irreversible, and, in most instances, immitigable impacts to the Project site, to the Valley Center and Bonsall communities and their community plans and to the County of San Diego and its General Plan. The Project will require significant amendments to the General Plan, its principles, policies, and regional land use designations and to the Bonsall and Valley Center Community Plans, or, at least, a severely disfigured interpretation of all of them.

The Revised Draft Environmental Impact Report [RDEIR] focuses on the grading of the Project site, on the use of fuels [energy] to prepare the Project site and manufacture construction materials, on the consumption of construction materials [wood, concrete, asphalt, drywall, etc.], on subsequent energy and natural resource consumption by the eventual residents, and on the amount of time to construct the project. It touches lightly on the loss of biological habitat [504-acres of the 608-acres lost to development].

All of this is true and expected for a Project of such proportions with the exception of the loss of biological habitat, and the severe gouging of the land. Habitat loss and gouging are not always required for such projects. That is one of the reasons why the U.S. Green Building Council's standard for Leadership in Energy and Environmental Design – Neighborhood Development [LEED ND] was created. That standard sets, as a prerequisite among others, appropriate site selection. LEED ND cites as key smart growth strategies the building on previously constructed development sites or 'infill' sites [surrounded or mostly surrounded by previously developed land], and, certainly not on agricultural lands.

Does the County think the Project site comports with the LEED ND prerequisites for site selection and linkage?

Given that this Project is classic Leap Frog development, why hasn't the County provided an analysis of the Project's consistency with LEED ND prerequisites for site selection and linkage, or any equivalent standard? Why doesn't the RDEIR analyze the Project's consistency with the other LEED ND prerequisites and construction requirements?

Why hasn't the County pressed the applicant to elaborate how the Project meets the LEED ND standard prerequisites for site selection in the case of this Project?

Shouldn't there be an analysis in the Specific Plan to assure the County that LEED ND standards, or their equivalent, are being met?

When a truly smart growth site is selected, there is no additional loss of biological habitat or excessive land gouging. For this Project, LEED ND was not observed nor respected. Oddly, the County General Plan recognizes the importance of LEED ND criteria and cites them as part of its principles. But, the County's RDEIR and the applicant would subvert them, or ignore them, in this case.

Why does the RDEIR not analyze the Project in terms of its consistency with LEED ND given that, as a "leapfrog development, it must be certified as consistent with LEED ND requirements or its equivalent" in order to be approved?

Does the County believe that the Project can be certified at any level of LEED ND if built on

C1d-168, cont.

C1d-169

C1d-168 The project proposes and will require a project-specific General Plan Amendment (GP 12-001). Specifically, GP 12-001 proposes to: (1) amend the regional Land Use Element map to allow a new Village, (2) amend the Valley Center Community Plan Map to allow Village Residential and Village Core land uses (and revise the community plan text to include the project), (3) amend the Bonsall Community Plan to allow Village Residential land uses, and (4) amend the Mobility Element to reclassify West Lilac Road and specify the reclassified road segments at Table M-4. (FEIR, subchapter 1.2.1.1.) Such amendment is purely specific to the proposed project. The FEIR frames the General Plan consistency analysis at 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. The General Plan Regional Land Use Map is proposed to be amended to remove the existing regional category and land use designation and to redesignate the project area as Village. Then subsequently provides detailed analysis of the physical environmental impacts that may flow from the GPA in Chapters 2.0 and 3.0, as well as providing a detailed policy inconsistency analysis in the Land Use Planning section, subchapter 3.1.4 (See FEIR, Chapter 3.0; Appendix W) Thus, the FEIR provides an analysis of the potential physical environmental impacts that would result from project approval and the concomitant amendment of the Regional Land Use Element Map to change the regional land use category from Semi-Rural to Village.

With respect to the project's compliance with LU-1.2, please see also Global Responses: Project Consistency with General Plan Policy LU-1.2 and General Plan Amendment CEQA Impacts Analysis.

C1d-169 See response to comment C1d-168, above.

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the presently proposed site?

If the County is using an equivalent standard for certification, what is the equivalent standard?

How does this Project qualify under any other standard if that standard is the equivalent of LEED ND?

The RDEIR is correct to cite environmental changes to the Project site based on the 4-million cubic yards of cut and fill proposed for the site. That is nearly 1.5 cubic yards of cut and fill for every single square yard of the Project site. Of course, some square yards will be treated more drastically than others. Some will be blasted to a depth greater than 50-feet. This significant disruption of the natural surface of the land is one of the greatest irreversible changes that will take place, and it is irretrievable once performed.

Does the County truly think that the blasting and movement of 4+-million cubic yards of earth is consistent with the local community character? Is mitigation possible?

And, it will take an enormous amount of extra energy and effort to move the 4-million cubic yards of earth around the site to make it conveniently buildable for so many densely packed dwelling units and so much commercial space.

Aside from transforming the land surface, moving so much earth and rock to accommodate the development of the Project will also permanently eliminate the Project site as biological habitat for native vegetation, wildlife and agriculture. Comments related to subchapter 2.5, Biological Resources, address the loss of foraging and breeding habitat and the beneficial interaction of wildlife with agricultural lands. State and federal laws address the losses of wildlife habitat.

Again, the General Plan recognizes the importance of natural habitats to the County, but the RDEIR suggests that losses of natural habitat can be mitigated by forcing wildlife, that is able, to move to other undeveloped lands in the County and by sacrificing native vegetation with the understanding that the losses caused by this individual Project are not significant.

Of course, the RDEIR does not adequately address the cumulative impact of scores of such individual losses caused by multiple projects and the irreversible loss of the majority of such habitat in the aggregation of these individual losses. Viewed incrementally, these individual project losses can be rationalized as minor and insignificant, but viewed collectively over the course of 50-years and on the scale of the entire County, they add up to a very significant majority of natural habitats [the California Department of Fish and Wildlife cites the loss of an estimated 85-90% of the historical extent of coastal sage scrub habitat in the state's Native Community Conservation Plan (NCCP) – Coastal Sage Scrub]. An acre here, an acre there, it all adds up.

Why does the RDEIR not address these cumulative irreversible losses of habitat within the County as a whole, or within the five-county southern California region, and the additive effect of large projects such as this Project?

The RDEIR also fails to adequately discuss the loss of agricultural land to this Project. The agricultural operations on and around the Project site are locally significant and typical of the operations that propel agriculture in San Diego County. The County's General Plan provides

C1d-169, cont.

C1d-170

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C1d-177

C1d-178

C1d-170 Refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for information responsive to this comment.

C1d-171 This comment provides general information that is not in conflict with information contained within the FEIR; therefore, no further response is required.

C1d-172 The FEIR, subchapter 2.9 acknowledges the cut and fill proposed to create the developed footprint of the project would result in an irreversible change to the existing topography. This grading is required to implement the project; however, ultimate build-out of the project would be consistent with community character, as further detailed below. Subchapter 3.1.4.2 analyzes the existing General Plan and community plan policies and concludes that the project is consistent with General Plan and Community Plan policies that address community character. Community character is defined as those features of a neighborhood, which give it an individual identity and the unique or significant resources that comprise the larger community. Community character is also a function of the existing land uses and natural environmental features based on a sense of space and boundaries, physical characteristics (such as geographic setting, presence of unique natural and man-made features, ambient noise, and air quality). The project has been designed to incorporate the design principles set forth in the Community Plan policies. Sensitive site design is used, open space areas are preserved, the built environment is integrated into the natural setting when possible, the location near existing infrastructure minimizes the expansion of public services, and buffer areas are utilized throughout the plan. Although the project would differ from existing uses in the immediate surrounding area, through sensitive site design these differences has been minimized. A Town Center with village green provides a community focus for this new village. Extensive open space, parks, and a trail system located within the village will retain its rural quality and rural lifestyle. In addition, the project has been designed to be compatible with the existing rural character of the immediately adjacent areas. The area immediately surrounding the project site consists of gently rolling topography with agriculture being the predominant use. There are small older farm houses and new custom homes. The project would differ from the existing uses but through sensitive site design has minimized the differences between it and the existing uses in the immediate surrounding area. The Specific Plan, Chapter 3 establishes design guidelines that will,

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	<p>C1d-172 (cont.)  among other things, establish transitions from adjacent spaced residential and agricultural uses to the denser uses within the entire Village. Single-family attached units would all be located internally in the Town Center and Neighborhood Center. The project also incorporates various design features to reduce visual effects along the project perimeter. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes.</p> <p>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 fruit trees will provide a transition from the project to the existing uses.</p> <p>C1d-173 See response to comment C1d-172, above.</p> <p>C1d-174 Impacts to biological resources, including habitat for native vegetation, wildlife, foraging and breeding habitat are addressed in FEIR subchapter 2.5 and the Biological Resources Report (Appendix G). As identified in that section, the entire existing site does not consist of biological habitat and the project development would not eliminate the entire project site as biological habitat as implied by this comment. The project includes preserving approximately 103 acres of the site (see FEIR Table 2.5-4 for habitat types). It is also noted that the project site is not designated or zoned for open space preservation, and that the site is currently zoned for agricultural and rural residential uses. With the provision of mitigation in compliance with the County's Biological Guidelines and the wildlife agencies' permits, impacts to biological resources are reduced to less than significant. Mitigation would be provided at ratios designated by the County and wildlife agencies to reduce impacts to below a level of significance.</p> <p>As indicated in the General Plan Consistency Analysis (Appendix W), the project is consistent with the general plan biological goals and policies. The project design is intended to conserve the most sensitive natural habitat as possible, including a focus on conserving the riparian corridors. Mitigation would also ensure no net loss of wetlands and would also compensate for losses of uplands. Refer to Appendix W for additional details.</p>
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	<p>C1d-175 See response to comment C1b-174, above.</p> <p>C1d-176 Cumulative biological impacts are addressed in FEIR subchapter 2.5.3 and the Biological Resources Report, Appendix G. The project's compliance with all habitat mitigation requirements, along with wetland protection measures assures that the project would have a less than cumulatively significant impact to biological resources. The project would be required to obtain a Habitat Loss Permit for impacts to coastal sage scrub in accordance with the NCCP. It is noted that M-BIO-1 includes mitigation for coastal sage scrub and impacts to coastal sage scrub (including disturbed) shall be mitigated at a 2:1 ratio with land within a future PAMA area.</p> <p>C1d-177 The FEIR does adequately address the cumulative impacts to sensitive habitat. See response to comment C1d-176.</p> <p>C1d-178 Agricultural resources are addressed in FEIR subchapter 2.4. Contrary to this comment, the entire 504-acre area to be developed on-site does not consist of significant agricultural farmland resources. As discussed, the project would result in a loss of 43.8 acres of significant agricultural resources per the LARA Model (Impact AG-1) and potentially result in significant indirect impacts to surrounding agricultural uses (Impacts AG-2 through AG-15). These potential impacts would be reduced to less than significant levels through the implementation of mitigation M-AG-1 through M-AG-5. Please see Global Responses: Project Consistency with General Plan Policy LU-1.2 and Agricultural Resources, Direct Impacts. Overall, the FEIR adequately discloses agricultural resource impacts.</p>
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Chapter 2: Significant Environmental Effects of the Proposed Project 40

for the preservation of existing farmland as a key goal and principle. LEED ND standards discourage development on agricultural lands.

The County's land surface is finite. At what point does the loss of 504-acres of farmland in a Project like this one push the County over the edge to a completely urban County?

Beyond the irreversible impacts and losses of land features and biological habitat are losses to the structure of governance. After over 12 years of discussion, revision, and compromise; thousands of hours of citizen volunteer effort; and, the expenditure of nearly \$20 Million in taxpayer funds, the San Diego County General Plan, approved in August 2011, became, in the words of the California Supreme Court, "the constitution for future development." Citizens purchasing property could look to the County's General Plan to apply diligence regarding future land uses surrounding the property they wished to buy and make a judgment on the value and appropriateness of such a purchase. Will the County defend the General Plan from the depredations of Projects like this one?

Moreover, this Project would subvert the intention of the state legislature to have every county adopt "... a comprehensive, long term general plan" [Calif. Gov. Code §65300; emphasis added]. For, in order to be approved, this Project would require the County to radically amend its general plan after only three years of existence to accommodate this Project. This Project was conceived as the present General Plan was being finalized and the applicant could have sought inclusion in it. The applicant did not.

Consequently, to be approved, this Project will require the County to substantially revise the General Plan's approved land use designations for the Project's site, and cause the County to strenuously distort the interpretation of the General Plan's goals, principles and policies [or to simply amend them to fit]. These actions will subvert the General Plan and throw the Bonsall and Valley Center Community Plans into disarray. This is not what the legislature had in mind.

Nor should a single commercial applicant be able to overturn the intent and authority of the General Plan to finagle approval for a single project that is inconsistent with that plan.

Similarly, the Bonsall and Valley Center Community Plans, extensions of the San Diego County General Plan, will have to be amended to accommodate this Project. This Project will mangle the hard-won compromises on land use designations for both communities. Both communities were planned using the Community Development Model defined in the General Plan. Both communities adopted land use and zoning plans that gradually diminished densities from their core villages to the limits of their planning areas, consistent with the model. The present Project undermines those plans with no particular benefit to either community.

Further, moving so much ground and building so many structures will irreversibly change the view-scape for owners of surrounding properties as well as others living in or passing through Valley Center and Bonsall. The proposed Project will diametrically convert extensive native vegetation, agricultural fields and orchards into a sprawling urban/suburban view-scape, quite out of place with its surroundings. In the process, it will have a similar urbanizing and growth-inducing effect on the I-15 corridor to the west.

Admittedly, the losses to the structure of governance are ultimately reversible. However, given the long-term expectation for general plans, perversion of the present General Plan by

C1d-178, cont.

C1d-179

C1d-180

C1d-181

C1d-182

C1d-179 This comment expresses the opinions of the commenter only. No further response is required. As detailed in Appendix W of the FEIR, the project is consistent with the General Plan.

C1d-180 It is acknowledged that the project requires a General Plan Amendment. This comment does not raise an environmental issue. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider. 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.) Under Government Code section 65358 a mandatory element of the General Plan may be amended up to four (4) times per year, and each amendment may include more than one change to the General Plan. Further, the County Board of Supervisors may specify the manner in which a General Plan Amendment can be initiated. (Government Code section 65358(a).) County Board Policy I-63 sets out the manner and process by which a property owner can initiate a General Plan Amendment. The project applicant properly followed that process in seeking the General Plan Amendment here. Further, 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.

It is acknowledged that the project requires a General Plan Amendment. As indicated in Appendix W, the project has been shown to be consistent with the General Plan as well as the community plans. This comment does not raise an issue with the environmental analysis. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W.

It is acknowledged that the project requires amendment to the Valley Center and Bonsall Community Plans. The project has been shown to be consistent with Community Plans, General Plan, and Community Development Model (see FEIR Appendix W). The project is amending the General Plan by adding new Village that meets the

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	<p>C1d-180 (cont.) criteria 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.</p> <p>C1d-181 The FEIR identifies four significant and unavoidable visual character or quality impacts of the project, specifically the FEIR identifies impacts V-1 through V-4 as significant and unavoidable visual impacts. These impacts result from views from West Lilac Road (Impact V-1), construction related visual impacts (V-3) and cumulative visual impacts (V-4). The FEIR also identifies a significant and unavoidable visual impact due to the change the composition of the visual environment in terms of dominance, scale, diversity, and continuity, as viewed from surrounding residential areas (Impact V-2). As discussed in FEIR subchapter 2.1 and summarized in Table S-1, mitigation for these impacts is not feasible. Therefore, the FEIR has adequately disclosed the potential visual impacts of the project. The FEIR also adequately discloses the potential growth inducing impacts of the project in subchapter 1.8 of Chapter 1.0 of the FEIR. As the comment does not raise a specific issue with the content of the FEIR, no further response is required.</p>
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such projects as this one will have effects that may outlast the lifetimes of many of the residents of Valley Center and Bonsall. Given those effects, irreversibility does not seem too much of a stretch.



C1d-182,  
cont.

C1d-182 This comment expresses the opinion of the commenter. For additional information responsive to this comment, see Appendix W.

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**DEPARTMENT OF TRANSPORTATION**

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June 24, 2014

Mr. Mark Slovick  
County of San Diego  
5201 Ruffin Road, Suite B  
San Diego, CA 92026

11-SD-15  
PM 43.28  
Lilac Hills Ranch Revised EIR

Dear Mr. Slovick:

The California Department of Transportation (Caltrans) has reviewed the Lilac Hills Ranch Draft Revised Environmental Impact Report (DREIR), located near Interstate 15 (I-15). Caltrans does not agree with the following statements identified for the mitigation measures within Caltrans jurisdiction:

M-TR-2, 3: Language was added in the revised EIR that the applicant or designee would be required to install traffic signals at the I-15/Gopher Canyon Road intersection, or Caltrans would agree to install signals provided funding by the applicant equivalent to the cost of installation. It should be noted that Caltrans would most likely not be involved in installing direct impact mitigation for a land development regardless of it being funded by others.

Caltrans does not agree with mitigation language throughout the EIR, whereby mitigation is determined to be infeasible and would remain significant and unavoidable because the impacts are within the jurisdiction of Caltrans, or there is no project, fund or program to contribute fair-share for cumulative impacts. It is the Lead Agency's responsibility to determine and disclose under CEQA the feasibility of implementing a mitigation measure. Stating that Caltrans does not have an identified project at a location identified to have an impact as justification for not mitigating does not meet the intent of CEQA. Furthermore, Caltrans does have a mechanism or program to collect fair-share contributions for cumulative impacts on Caltrans facilities.

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to enhance California's economy and livability"*

Responses to this letter are found in Comment Letter A. See also Response to Comment C1d-21 relating to significant intersection impacts at the I15 ramps and the feasibility of mitigation to reduce those impacts to a level that is less than significant.

LETTER

RESPONSE

June 24, 2014  
Mark Slovik  
Lilac Hills Ranch Revised EIR

If you have any questions, please contact Marisa Hampton at (619) 688-6954.

Sincerely,



JACOB ARMSTRONG, Chief  
Development Review Branch

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