

Letter C1I

DEIR 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).

EIR Project Objectives

The County's Project Objectives from the DEIR for the proposed Accretive Investments Lilac Hills Ranch Subdivision are

CHAPTER 1.0 PROJECT DESCRIPTION, LOCATION, AND ENVIRONMENTAL SETTING

1.1 Project Objectives

The proposed project is based on a wide range of reports that studied the different constraints and opportunities involving the project in concert with the County of San Diego and local community issues. The general components of the proposed project were determined using the project objectives described 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 the opportunity for residents to increase the recycling of waste.
8. Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.

below:

The County has structured the first Objective of the EIR so narrowly that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, preventing analyses of alternative sites that meet San Diego County General Plan objectives and leading to a self-serving and biased environmental analysis. *(Insert CEQA and Case cites here)*

The substantiation of this assertion is provided below.

C1I-1

C1I-1 The commenter's statement of the project objectives is noted.

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*. In addition, the project's objectives aided in developing a reasonable range of alternatives. Alternatives need to satisfy "most of the basic objectives of the project." A reasonable range of alternatives were discussed in the FEIR.

The County disagrees with the comment. Property located along I-15 or SR-76 could meet this objective. Subchapter 4.1.1.1 analyzed and rejected an off-site alternative.

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Objective 1 – The full text of Objective One with comment areas highlighted is below:

"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."

Develop a community within northern San Diego County in close proximity to a major transportation corridor – The County General Plan, approved just two years ago, already accommodates more growth than SANDAG projects. There is no requirement to convert land that is designated by the Community Model for agriculture, large animal keeping and estate residential in order to accommodate an additional Village with urban densities in Northern San Diego County.

The City of Escondido **SINCE 2007** has been developing an infill redevelopment mixed use Downtown Specific Plan Area (SPA) less than 14 miles south from the proposed Lilac Hill Ranch project. The Escondido Downtown SPA has a target Equivalent Dwelling Unit increase (EDU) of from 2,000 to 5,000 EDU.

Unlike the Accretive Project, the Escondido Project **meets Smart Growth and LEED-ND location requirements**, because it is an infill development with requisite infrastructure **truly within walking distance of the Escondido Transit Center** which has access to the Sprinter Train as well as being a hub for North County and Metropolitan Bus lines. Additionally, this location is less than a mile from access to I-15.

The Escondido Downtown SPA also provides a more viable solution for senior living facilities, including Assisted Living, because it is within two miles from the two Palomar Hospitals and major medical facilities.

The Escondido Downtown SPA document is available at the following link, that is also provided as Reference A.
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

Please also compare the Escondido Downtown SPA level of specificity and completeness of design to that of the Accretive Lilac Hills Ranch Specific Plan.

Accretive also makes an unsubstantiated assertion that the Valley Center's Village, designated by SANDAG as a "Smart Growth Opportunity Area" is not in close proximity to a major transportation corridor – **this is patently false**. Both the North and South Village nodes are traversed by Valley Center Road which was improved at a cost of \$50 Million to facilitate intensified commercial and residential development of Valley Center's central valley. A traditional crossroads since the late 1800s when Valley Center was homesteaded, the Community Plan has designated this area for compact village development since the first community plan in the 1960s. Valley Center Road is a 4 lane road with raised medians, specifically a Circulation Element 4.1A Major Road from Woods Valley Rd south to the city of Escondido, and from Lilac Rd. to Miller Rd. The other segments of Valley Center Road through the North and South Villages are 4.2A

C11-2

C11-3

C11-2

C11-3

This comment does not address the environmental analysis provided in the FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.

The project will help support the County-wide need for housing. The commenter bases their assertion that the project is not needed on SANDAG's population forecast. However, as stated by SANDAG, population forecasts are a "snapshot," reflective of a specific set of parameters used in the forecast. They are not reflective of need. San Diego County historically has not had enough homes built in any given year to meet demand regardless of what is shown on plans. The project will meet a small portion of the housing demand experienced throughout the County. See also responses to comments C1s-11, O3c-5, and O3g-8 relating to these issues.

Please also see the Global Response: Project Consistency with General Plan Policy LU-1.2 and the LEED-ND analysis.

A major transportation corridor is typically defined within the traffic engineering industry as a major freeway or 6-lane arterial with limited intersections. The North and South Villages are located 10–15 miles from I-15 (20–30 minutes) depending on the route taken.

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<p>Boulevard roads. This slightly lower classification reflects the traffic impacts of interconnection with North and South Village traffic flows.</p> <p>The proposed Lilac Hills Ranch Project contemplates overburdening 2.2 E and F two lane, narrow winding country roads to Level of Service E and F and requests ten Exemptions to County Road Standards for the 1 ¼ to 3 miles the Project needs to connect the 25,000 plus trips for this automobile based urban sprawl project with I-15.</p> <p>Accretive 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>Accretive does not have legal right of way for offsite sewer and recycled water pipelines that they indicate on their Preferred Route 3 to the Lower Moosa Water Reclamation Facility.</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 is misleading at best and not in compliance with CEQA and related State and County policies and Regulations. <i>(Insert State CEQA and Subdivision Map Act issues; County Subdivision Ordinance and DPW Public and Private Road Design Standards)</i></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>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.</p> <p>The General Plan growth in housing units across the entire County of San Diego is summarized in Table 1-1 below.</p>	<p>C1I-3 cont.</p> <p>C1I-4</p> <p>C1I-4</p> <p>C1I-5</p> <p>C1I-5</p> <p>The comment expresses the opinion of the commenter. See Global Response: Easements (Covey Lane and Mountain Ridge Roads).</p> <p>The FEIR at subchapter 2.3 and the Traffic Impact Study (Appendix E) identify all project-related traffic impacts, including those to I-15, which will operate at LOS E/F with or without the proposed project.</p> <p>The General Plan includes two policies that guide growth in Villages. Policy LU-1.4 specifically relates to growth in existing Villages. Policy LU-1.2 specifically refers to the development of new Villages. See Global Response: Project Consistency with General Plan Policy LU-1.2. See also response C1I-2 above regarding growth issues.</p> <p>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.</p> <p>With respect to the two Villages identified in the County General Plan, see response to comment O3c-3.</p>
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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	5,145	6,151	11.5%	19.2%	19.5%	58.7%
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%
Fairbrook	15,929	16,535	18,559	20,387	3.8%	12.2%	9.8%	28.0%
Jamul-Dulzura	3,234	3,372	4,398	5,263	4.3%	30.4%	19.7%	62.7%
Julian	1,711	1,748	1,884	2,015	2.2%	7.8%	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	8,884	8,797	13.3%	1.8%	1.3%	16.8%
Rainbow	708	750	881	963	5.9%	17.5%	9.3%	36.0%
Ramona	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	21,952	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 Oro	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	170,698	180,431	202,882	222,890	5.8%	12.4%	9.9%	30.8%
San Diego County	1,158,076	1,262,486	1,369,807	1,529,090	9.0%	8.5%	11.6%	32.0%

SOURCE: SANDAG Profile Warehouse: 2050 Forecast

C11-5
cont.

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 suitable infrastructure is (Roads, Sewers, Schools) 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

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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.

C1I-5
cont.

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 in either on the ground or planned (and funded) to be added shortly.

C1I-6

The combined composite 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 with LHR included	10,513	12,693	16,690	21,308	20.7%	31.5%	102.7%
Reference: SD County growth	1,158,076	1,262,488	1,369,807	1,529,090	9.0%	8.5%	32.0%

C1I-7

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.

C1I-8

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.

The proposed Lilac Hills Ranch Subdivision 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.

C1I-9

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

C1I-10

C1I-6 This comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider. See also response C1I-2 above regarding growth issues.

C1I-7 This comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider. See also response C1I-2 above regarding growth issues.

In addition, it must be noted that the referenced table reflects population projections that are, as described by SANDAG during Planning Commission hearings on the General Plan, a snapshot in time. They are regularly updated. See also responses to comment O3g-8.

C1I-8 The project is located less than one-half mile from the I-15 corridor. West Lilac Road will be improved as part of the project, making the trip to I-15 even quicker than it is in the existing condition.

C1I-9 The comment expresses the opinion of the commenter and does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.

Further, subchapter 2.3.5 of the FEIR discusses a range of mitigation measures and improvements to the area road network to address project impacts and to seek to maintain or enhance the level of service for road segments and intersections as feasible.

C1I-10 The FEIR acknowledges that mass transit is not available in the project area.

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<p>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.</p> <p>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 which a subset of the San Diego General Plan. Why does the first Objective ignore the balance of the General Plan? Because the Proposed Project is patently inconsistent with the San Diego County General Plan, as well as the Community Development Model within the General Plan.</p> <p>The General Plan states (San Diego County General Plan: Land Use Framework; Community Development Model, p.3-6): <i>"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 ..."</i></p> <p>First, as the above statement in the County General Plan makes clear, the Community Development Model is not a moveable abstract concept. If this were true then Village "puzzle pieces" could be dropped into Semi-Rural and Rural lands anywhere in the County and pronounced consistent with the Community Development Model.</p> <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> <ul style="list-style-type: none"> 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> The proposed site is designated not for Village development but for large semi-rural parcels (SR 10 and SR-4). This proposal to ploa 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. Further, the site abuts SR-4, SR-10 and Rural-40 acreage. The Community Development Model, which has been applied in Valley Center's central valley and 	<p>C1I-10 cont.</p> <p>C1I-11</p> <p>C1I-12</p> <p>C1I-13</p> <p>C1I-14</p> <p>C1I-11 The proposed project is designed to be consistent with the Community Development Model because it proposes a "Village" Regional Category that is surrounded by the Semi-Rural Regional Category, which transitions to the Rural Regional Category. As explained in the General Plan, "the Community Development Model is implemented by three regional categories—Village, Semi-Rural, and Rural Lands—that broadly reflect the different character and land use development goals of the County's developed areas, its lower-density residential and agricultural areas, and it's very low-density or undeveloped rural lands (see Figure LU-1 [Regional Categories Map] at the end of the section). The Community Development Model directs the highest intensities and greatest mix of uses to Village areas, while directing lower-intensity uses, such as estate-style residential lots and agricultural operations, to Semi-Rural areas. The Semi-Rural category may effectively serve as an edge to the Village, as well as a transition to the lowest-density category, Rural Lands.</p> <p>Furthermore, 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). The project would provide all necessary infrastructure, including water, wastewater, and fire. Please also refer to the Global Response: Project Consistency with the General Plan Policy LU-1.2. See also responses to comments for letters O3e and I51n.</p> <p>C1I-12 This comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.</p> <p>C1I-13 A General Plan Amendment is necessary to implement the proposed project. See response to comment C1I-11 above and the Global Response: Project Consistency with the General Plan and Policy LU-1.2.</p> <p>C1I-14 This comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.</p> <p>There is no requirement in the General Plan that a Village regional category transition to specific semi-rural land use designations. The project would conform to the Community Development Model with the highest intensities (commercial, mixed-use and attached residential)</p>
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<p>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> <ul style="list-style-type: none"> • 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. • 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 capacities of these roads. Water infrastructure serves 50 homes and agricultural irrigation. There is no wastewater service. • 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 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 "crossroads" where road, water and wastewater infrastructure, as well as schools, churches, shops and businesses are already in place. <p>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.</p> <p>The second issue is that "walkability" is usually defined a ½ mile one way trip. The large majority of the Commercial zoning is in the Northern town center, 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.</p> <p><u>Summary and Conclusion – Objective One</u> The County has structured the first Objective of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis.</p> <p><i>(CEQA and Case cites that back the conclusion statement)</i></p>	<p>C1I-14 (cont.) within the central portion of the project (town center) and the lower-intensity residential uses around the perimeter of the site (single-family detached). Furthermore, the project site is surrounded by the Semi-Rural Regional Category, which transitions to the Rural Regional Category.</p> <p>However, the project includes several methods of transitioning from the denser uses on-site 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.</p> <p>C1I-15 Guiding Principal 2, in which the Community Development Model is located, recognizes that Villages can be large or small, and that smaller villages provide services appropriate to its size.</p> <p>C1I-16 Subchapter 2.3.5 of the FEIR discusses a range of mitigation measures and improvements to the area road network to address project impacts and to seek to maintain or enhance the level of service for road segments and intersections as feasible. Water and wastewater service for the project is discussed in the FEIR, subchapter 3.1.7.</p> <p>C1I-17 This comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.</p> <p>There is no prohibition on the development of new Villages. Policy LU-1.2 specifically guides the development of new Villages as General Plan Amendments. With respect to the two Villages identified in the County General Plan, see response to comment O3c-3.</p> <p>C1I-18 This comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.</p> <p>All homes would be located within a one-half mile of commercial services, which is defined as walking distance in the General Plan.</p>
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<p>Objective 2 – The full text with comment areas highlighted is below:</p> <p>“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.”</p> <p>in a manner that encourages walking and riding bikes - 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 gonna risk taking a walk or riding a bike?</p> <p>public services and facilities that are accessible to residents of both the community and the surrounding area – 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 the School District, a vague description of the minimum acreage of Parks the County requires? Does the undefined Commercial content include a Supermarket or community market? A restaurant of any kind? A retail gasoline service station?</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. Is this because the Applicant is overly optimistically portraying the true Traffic Impact of this Project?</p> <p><u>Summary and Conclusion – Objective Two</u> The project does not meet its own Objective for Objective Two.</p> <p>Objective 3 – The full text is below:</p> <p>“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.”</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.</p> <p>Objective 4 - The full text with comment areas highlighted is below: “Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.”</p>	<p>C1I-19 Please refer to response to comment C1I-1 above.</p> <p>C1I-20 This comment does not address the environmental analysis provided in the project FEIR. The commenter’s opinion is acknowledged and is included in the project’s FEIR for the decision makers to consider.</p> <p>Refer to the Global Response: Easements (Covey Lane and Mountain Ridge Roads).</p> <p>C1I-21 As stated in the FEIR Chapter 1.0, the school site will be available to either school district. As further discussed in the 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. Also, the project will, at a minimum, meet the requirements of the Parkland Dedication Ordinance. All small parks within Phases 1-3 are open to the public. The large, 13.5-acre public park will also contribute to the overall public park amenities in the area. Possible commercial uses for the project are generally discussed in FEIR subchapters 1.2.1.3 and 2.3.2.</p> <p>C1I-22 FEIR subchapter 2.3 and Appendix E discuss in detail the trip generation rates and traffic impacts related to the project based on all appropriate and applicable study methodologies.</p> <p>C1I-23 The FEIR, Chapter 1.0 and Specific Plan clearly show that the project meets Objective 2.</p> <p>C1I-24 This comment does not address the environmental analysis provided in the project FEIR. The commenter’s opinion is acknowledged and is included in the project’s FEIR for the decision makers to consider.</p> <p>See response to comment C1I-1 above.</p> <p>C1I-25 This comment does not address the environmental analysis provided in the project FEIR. The commenter’s opinion is acknowledged and is included in the project’s FEIR for the decision makers to consider.</p> <p>See response to comment C1I-1 above.</p>
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RESPONSE

<p>There are three issues with this Objective. The first issue is that the Objective is so vague and subjective that compliance is not measurable.</p> <p>The second issue is with the highlighted statement: "Integrate major physical features into the project design, including major drainages, and woodlands"</p> <p>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?</p> <p>The third issue is with the highlighted statement that follows: "creating a hydrologically sensitive community in order to reduce urban runoff."</p> <p>From our analysis of the Accretive Hydromodification Design, we find the analysis is marginal; requiring 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 farm land with impermeable surfaces. If the Hydro design is compliant, it achieves compliance only in the most optimistic scenarios with scant margin. Is this what a hydrologically sensitive community is?</p> <p><u>Summary and Conclusion – Objective Four</u> The project does not meet its own Objective for Objective Four</p> <p>Objective 5 – The full text is below:</p> <p>"Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area." 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.</p> <p>Objective 6 – The full text with comment areas highlighted is below: "Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing."</p> <p>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.</p> <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 does not have Urban Densities.</p>	<p>C1I-25 cont.</p> <p>C1I-26</p> <p>C1I-27</p> <p>C1I-27</p> <p>C1I-28</p> <p>C1I-28</p> <p>C1I-29</p> <p>C1I-29</p> <p>C1I-30</p> <p>C1I-26 The project preserves 103.6 acres of natural habitat within permanent open space, which is roughly 70 percent of the existing natural vegetation on the project site. Further, about 94 percent of existing County RPO wetlands on site are preserved as part of the project design, as is about 93 percent of various types of on-site woodland habitats. Also, as discussed in the FEIR, subchapter 3.1.3, the project will not result in significant impacts to drainage.</p> <p>C1I-27 The comment expresses the opinion of the commenter. The hydrology studies as required have been designed to address a worst case scenario. The standard 'tool' to mitigate for storm water runoff is the use of detention basins and the project is designed with detention basins that can handle the worst case scenario. See response to comment I51o-2.</p> <p>Use of bioretention on single-family lots, rain barrels, and permeable pavers can reduce the need for detention basins significantly because they can be deployed throughout the community, virtually on every lot and on every street. There is not a commitment per the reports to use these other techniques because they are not yet approved by the County. However, they will be included in project plans and used if approved to achieve the required hydrologically neutral outcome.</p> <p>C1I-28 The FEIR, Chapter 1.0 and Specific Plan clearly show that the project meets Objective 4.</p> <p>C1I-29 This comment raises no issue; no response required.</p> <p>C1I-30 Any project that would provide a range of housing types could meet this objective. For example, EIR alternatives 4 (Reduced Footprint) and 6 (2.2C) would meet this objective. It is not limited to the project. See response to comment C1I-1 above.</p>
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<p>This Objective is another example of where the County has structured the Objectives of the EIR so narrowly with an planned bias that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis.</p> <p>Objective 7 – The full text is below:</p> <p>"Provide the opportunity for residents to increase the recycling of waste."</p> <p>We do not have any issues with this Objective other than to state that having an on-site recycling facility is not the only opportunity to increase recycling of waste; with the huge amounts of waste the Accretive Urban Sprawl (AUS) creates one is necessary to marginally comply with Traffic Standards on trash day.</p> <p>All of the Alternatives comply with this Objective equally</p> <p>Objective 8 – The full text is below:</p> <p>"Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses."</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><u>Summary</u></p> <p>The County has structured the Objectives of the EIR in aggregate so narrowly that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis. <i>(re- insert CEQA and Case cites here)</i></p> <p>Sincerely,</p>	<p>C1I-30 cont.</p> <p>C1I-31</p> <p>C1I-32</p> <p>C1I-33</p> <p>C1I-31 The recycling facility is included as part of the proposed project, but not under five of the alternatives as there would not be enough units to support such a facility.</p> <p>C1I-32 Development at the General Plan densities would not include a school or commercial uses. Preservation of agriculture would not be guaranteed with development at General Plan densities.</p> <p>C1I-33 The comment expresses the opinion of the commenter. See response to comment C1I-1 above.</p>
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(Your Name)
(Your Street Address)
(Your City, State, and Zip)

Reference A: Escondido Downtown Specific Plan Area
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

Attachment A: North County Transit District Breeze Bus Routes 388 and 389