

Letter C1s

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)

Draft Environmental Impact Report (DEIR) Project Alternatives

The County's Project Alternatives Analysis in Chapter 4 of the Lilac Hills Ranch DEIR is grossly defective in meeting CEQA requirements in five areas that are summarized below:

1. The DEIR Objectives against which the Alternatives are judged for Environmental Impacts are biased and should be changed to equitable Objectives, from which compliance against can be fairly measured.
2. The Project does not meet its own Objectives, when fairly assessed.
3. There is a valid offsite Alternative – the Downtown Escondido Specific Plan Area (SPA) that needs to be included as an Alternative.
4. The Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid are not valid Alternatives. These three "Alternatives" are density variations of the Project. These Alternatives are also not described in enough detail to provide informed Environmental Impact Analysis.
5. The Alternatives were not fairly assessed in the DEIR by the Applicant.
6. When all eight Alternatives are fairly assessed, the Downtown Escondido SPA meets more Objectives than the Project or any Alternatives.

Overview

The Lilac Hills Ranch Project Alternatives from Chapter 4.0 of the DEIR are below:

1. No Project/No Development Alternative
2. No Project / Existing Legal Lot Alternative (49 EDU + no commercial)
3. General Plan Consistent Alternative (110 EDU + no commercial)
4. Reduced Footprint Alternative (1251 EDU + 6 acres of commercial)
5. Reduced Intensity Alternative (881 EDU + 5.6 acres of commercial)
6. 2.2C (Hybrid) Alternative (1365 EDU + 15.3 acres of commercial)

There are no issues with the either the selection as an Alternative or analysis performed for the No Project/No Development Alternative, No Project / Existing Legal Lot Alternative, and General Plan Consistent Alternatives.

There is a full Environmental Impact for these Alternatives provided by the San Diego County General Plan dated August 3, 2011. All three of these alternatives were in the baseline (or close enough for measurement error) for the General Plan. The relevant Environmental Impact has been disclosed and analyzed in sufficient detail as part of the recent General Plan process.

C1s-1

C1s-1 The introductory comment is noted. Please refer to the response to comments C1s-2 through C1s-12 for complete responses to the issues raised. 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.

LETTER

RESPONSE

<p>The Communities of Bonsall and Valley Center support the General Plan Consistent Alternative as the proper land use and zoning for this Project. The 110 unit residential density with A70 zoning is the maximum density land use that the Circulation Element Road Network will support without Direct Development Impact.</p> <p><u>1- DEIR Objectives are biased and should be changed</u></p> <p>The legal adequacy of selecting many of the eight Project Objectives does not conform to the requirements of the California Environmental Quality Act (CEQA). Our detailed analysis is enclosed in Attachment A – DEIR Project Objective Issues letter dated <b>July 29, 2013</b>.</p> <p><u>2 - The Project does not meet its own Objectives, when fairly assessed</u></p> <p>Consistency with Objective One – <b>THE PROJECT IS INCONSISTENT WITH OBJECTIVE ONE</b></p> <p>The full text of Objective One is below:</p> <p>“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.”</p> <p>The proposed Lilac Hills Ranch Subdivision is a classic urban sprawl development. All of the transportation will be via automobiles, and the existing and proposed Project post-construction road infrastructure does not support the 9 fold increase in traffic and related Direct Development Impact the Project generates to the public road network.</p> <p>A fundamental premise of Smart Growth is to lower automobile dependency as compared to average Development. The Accretive proposed Lilac Hills Ranch Development does not comply with Smart Growth Principles.</p> <p>The SANDAG average miles/trip for all of San Diego County is 5.8 miles/trip.</p> <p>The Accretive Urban Sprawl (AUS) project is proposing an automobile based urban sprawl community that even with exceedingly high internal trip rates is 47% higher than the San Diego County average ( 8.52/5.8) trip distance.</p> <p>How is the Lilac Hills Ranch proposed development Smart Growth?</p> <p>The ONLY mass transit that exists is the North County Transit District (NCTD) Bus Routes 388 and 389. 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</p>	<p>C1s-2 The project objectives, developed by the applicant, 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. Please refer to Letter C1I, which is the Project’s Objectives Issues letter dated July 29, 2013, referenced in this comment.</p> <p>C1s-3 The project is consistent with Objective 1. The project provides a pedestrian oriented community where all residential areas are within reasonable walking distance to proposed village and neighborhood centers. The project site is close to the I-15 corridor providing regional assess and is consistent with the County’s Community Development Model. The County disagrees that all transportation would be via auto; therefore, it does not classify as urban sprawl. While regular commuter trips would primarily be via automobiles similar to most commuter trips in the unincorporated County, the project encourages non-automobile trips to schools, parks, and nearby retail. As described in subchapter 1.2.1.4, the project has been designed as a walkable village and pedestrian prioritized community. The centrally located Town Center and Neighborhood Centers would be located within a half-mile radius (10-minute walk) of the residential areas. Primary streetscapes would be designed to be pedestrian-oriented and provide tree-shaded walkways, pedestrian scaled lighting, and shortened crossing distances or enhanced crosswalks. The project also includes numerous trails, community pathways, bike lanes and similar facilities throughout the project site (see, FEIR Figure 1-8). Specifically, the project includes two bike lanes on Main Street through the Town Center and off-street multi-surface trail connects the Town Center to the Neighborhood Center (North). Examples of conditions of approval which the project shall be required to implement include the following design features intended to support the community’s walkability and bikeability:</p> <ul style="list-style-type: none"> <li>• Design elements to reduce reliance on single-occupancy vehicles and reduce traffic, such as complete sidewalk coverage within the project, internal trails, and bike lanes (see, Air Quality Chapter 2.2 of the FEIR);</li> <li>• To reduce the number of vehicle trips generated by the proposed development, the project includes the implementation of a Transportation Demand Management (TDM) program to foster alternative modes of transportation. (see Traffic Chapter 2.3 and Table 1-3 of the FEIR); and</li> </ul>
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LETTER

RESPONSE

- On-site uses (including neighborhood-serving retail and restaurant uses, an elementary/middle school, church site, recreation center, a neighborhood park, and a recycling collection center) will be located within walking distance (one-half mile) of residential uses. (see, Greenhouse Gas Chapter 3.1.2 of the FEIR);

With respect to the comment that road infrastructure will not be able to support increased traffic after project build-out, subchapter 1.8 of the FEIR explains that project-related road system improvements will not add additional travel lanes or construct new roads to serve undeveloped areas. Subchapter 2.3 of the FEIR also explains that most of the project-related direct and cumulative significant impacts to the existing transportation network in the area can be reduced to below a level of significance by relatively minor improvements to existing road system elements or by payments to the County TIF Program. The few direct significant impacts to intersections and cumulative impacts to road segments and intersections that are not reduced to below a level of significance result from the required installation of mitigation measures that are either outside the jurisdiction of the County of San Diego or are beyond the proportional impacts of the project, and are therefore infeasible. Further, the FEIR does identify that after implementation of all feasible mitigation measures, significant and unavoidable traffic related impacts would remain (see, FEIR subchapter 2.3); however, a statement of overriding considerations has been prepared identifying the benefits of the project which outweigh the remaining impacts.

Trip Length was calculated from SANDAG model runs to compare the project's VMT versus that of the Valley Center Community Planning Area (CPA) and the San Diego Region.

Scenario	Level	Trip Length
Valley Center CPA w/o Project	CPA	8.22
Valley Center CPA w/ Project	CPA	8.12
Lilac Hills Ranch only	Project	7.36
	Region (SANDAG)	5.81

As shown in the table, the project's average trip length would be 7.36 miles. Additionally, implementation of the project would result in the reduction of the average trip length within Valley Center.

LETTER

RESPONSE

<p>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>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><b>Consistency with Objective Two – THE PROJECT IS INCONSISTENT WITH OBJECTIVE TWO</b></p> <p>The full text with comment areas 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 and Mountain Ridge/Circle R intersections, and the traffic load the Project will throw on internal and external roads, <b>who is gonna risk taking a walk or riding a bike?</b></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. <b>Is this because the Applicant is overly optimistically portraying the true Traffic Impact and related Direct Development impact of this Project?</b></p> <p><b>Consistency with Objective Three – THE PROJECT AND ALL ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE EQUALLY CONSISTENT WITH OBJECTIVE THREE</b></p> <p>The full text is below:</p>	<p>C1s-4 The project is consistent with Objective 2 providing multiple walking and biking trails both within and along the exterior of the project site. The Applicant is requesting ten exceptions to County road standards to allow construction of roads associated with the project. The County's adopted Public Road Standards specifically allow exceptions to these standards. (Section 1.3 and Section 9). The Public Road Standards note that County staff reviews all requests for exceptions to road standards and considers the following: "consistency with existing road characteristics and geometrics in the project vicinity, effects on safety of all road users, likelihood of future public or private upgrades to the affected roads, compatibility with existing land uses including access points to and from individual properties, established front-yard setbacks, potential impacts to environmental and cultural resources, consistency with the adopted General Plan, Community Plan and Specific Plans for the area, utility relocations, project and plan submittals made prior to the adoption of these standards, and established community character guidelines in the area."</p> <p>The roadway standard modification requests are detailed in Table 1-2 of the FEIR and reflected in the Circulation System of the project, as analyzed in FEIR Subchapter 2.3. The road exceptions would not result in an increase in road capacity, but rather reduce design speeds and curvatures of the roads. By reducing design speeds, use of the roadways by pedestrians and bicyclists is encouraged because roads with lower traffic speed are more inviting than roads with faster traffic. As a result, the road exceptions support a more walkable and bikeable community by enhancing the comfort and safety for both cyclists and pedestrians. The road exceptions would not lead to risk in terms of alternative mobility, but would be safe for vehicles, bicyclists, and/or pedestrians.</p> <p>The project's proposed public facilities are detailed in FEIR subchapter 1.2 and the Specific Plan. Public facilities include: a 12-acre school site; a 13.5-acre public park, which would include ball fields and other recreational amenities. With respect to the school site, under the Specific Plan, the school site is zoned RU with an S designation. The 12-acre K-8 school site within Phase 3 is proposed for public or private school to serve the educational needs of the residents of the project and surrounding areas. The two local school districts would have an opportunity to acquire the site based on their independent assessment of their facility needs. Bonsall Unified School District stated in its October 30, 2014 letter to the County about this project that the</p>
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LETTER

RESPONSE

	<p>C1s-4 (cont.)</p> <p>proposed school site is “well located at a central site within the community with adequate roads and other infrastructure planned to accommodate the new school.” The District also said in the letter that it would discuss with the developer the possible operation of a school at the site for the about 684 new students from the project that would be enrolled in the District, although any potential use of the school site would depend on District-wide future facility needs. It is also possible that a private school would acquire the site, or the site would be developed as a charter school. The site would be graded and utility installation to the property would be completed by the developer, which would reduce the development costs for possible use of the site as a school. The site would be held for acquisition for two years, as required by the Map Act Section 66480, after grading and utility installation before it could be used for something else. If neither a public or private entity obtains the site, it may be considered for an alternative use.</p> <p>With respect to the park component of the project, under the County’s Park Lands Dedication Ordinance (PLDO) the project is required to dedicate 15.09 acres of parkland. The project would provide 25.6 acres of parkland of which 19.1 acres would count toward the PLDO requirement. As shown on FEIR Figure 1-9, the project would provide numerous parks located throughout the project site including a 13.5-acre public park, 10.1 acres of private parks, and a 2.0-acre private recreation facility.</p> <p>As stated in FEIR Subchapter 1.2, the project would include 90,000 square feet of specialty commercial and office uses. As stated in the Specific Plan, the types of permitted and conditional commercial uses will be regulated by the County’s existing C34 Use Regulations (refer to County Zoning Ordinance Section 2340). The C34 Use Regulations allow for a grocery store, retails sales, restaurants or a gasoline service station, all of which would fall under SANDAG “specialty retail/strip commercial” uses.</p> <p>The on-site commercial uses, along with the public park and trails would be open and available to the public. The commenter questions the use and rate of internal trip capture associated with the proposed project. As cited in FEIR Subchapter 2.3, the overall internal trip capture rate for all land uses proposed by the project is 22 percent. Refer to the Traffic Impact Study (FEIR Appendix E) for additional information regarding the internal capture rate.</p>
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LETTER

RESPONSE

<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>All Alternatives are required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) that must comply with this Objective.</p> <p><b>Consistency with Objective Four – THE PROJECT IS INCONSISTENT WITH OBJECTIVE FOUR</b></p> <p>"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>There are three issues with this Objective. The first issue is that the Objective is so <b>vague and subjective that compliance is not measurable.</b></p> <p>The second issue is with the 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 volume and velocity with impermeable surfaces? Does introduction of large quantities of urban surface water runoff Total Dissolved Solids and Pathogens benefit the woodlands?</p> <p>The third issue is with the statement that follows: "creating a hydrologically sensitive community in order to reduce urban runoff."</p> <p>Accretive is proposing disturbing 440 acres of 608 total acres of rural farm land and populating a high percentage of the 440 acres with impermeable surfaces. <b>Is this what a hydrologically sensitive community is?</b></p> <p><b>Consistency with Objective Five – THE PROJECT AND ALL ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE CONSISTENT WITH OBJECTIVE FIVE</b></p> <p>The full text is below:</p> <p>"Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area."</p> <p>Any Project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) must comply with this Objective.</p>	<p>C1s-5 The County disagrees that all project alternatives are equally consistent with Objective 3. The project provides numerous parks and recreational opportunities for its residents as well as for the community. As stated in FEIR Subchapters 4.2 and 4.3, the No Project/No Development Alternative and the Legal Lot Alternative would not meet objective 3, as no parkland would be provided. For the No Project/No Development scenario, and Legal Lot Alternative, these alternatives do not require parkland and in-lieu fees would be provided instead.</p> <p>C1s-6 The County disagrees that Objective 4 is vague and subjective and cannot be measured. The project proposes to reduce storm water runoff and protect drainages beyond ordinance requirements. The project is consistent with Objective 4. The project preserves 104.1 acres of natural habitat which is roughly 70 percent of the existing natural vegetation. About 94% of existing County RPO wetlands on site are preserved intact as part of the project design, as is about 93% of various types of onsite woodland habitat. As discussed in the FEIR Subchapter 3.1.3, the project will not result in significant impacts to drainage or runoff. With respect to the disturbance of agricultural land, please refer to FEIR Chapter 2.4, which identifies potentially significant impacts associated with the loss of agricultural land and sensitive soils, and discusses feasible mitigation measures to be implemented to reduce such impacts to below a level of significance. The County acknowledges that the project will increase the amount of run off due to changes in land use from rural to higher density residential and commercial uses. As detailed in FEIR subchapter 3.1.3, allowing the permanent development of impervious surfaces could increase runoff and potentially result in significant impacts associated with such. State and local regulations including the NPDES which requires the development of a hydromodification management plan and a storm water management plan and the County Water Protection Ordinance, assure that the project would account for such alterations in drainage. The project would be required to show conformance to the County's General Plan. Specifically, Policies LU-6.5 and COS 5.3 require new development to use Low Impact Development (LID) techniques, and Best Management Practices (BMPs) in project designs. 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 Stormwater Management Plan (SWMP) prepared for the project. Additionally, Policy S-10.6 requires new</p>
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LETTER

RESPONSE

	<p>C1s-6 (cont.) development to maintain existing area hydrology. As detailed in the project's hydrology studies, the project has developed a comprehensive drainage plan (see below) as a means to reduce and slow increased project runoff and maintain on-site hydrology. Please also refer to the design features identified in the Major SWMP, Drainage Study, and Hydromodification Management Plan detailed in FEIR Appendices U-1, U-2 and U-3, respectively.</p> <p>C1s-7 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

<p>Consistency with Objective Six – <b>THE PROJECT IS CONSISTENT WITH OBJECTIVE SIX BECAUSE THE OBJECTIVE IS BIASED IN FAVOR OF THE PROJECT</b></p> <p>The full text with comment areas highlighted is below:</p> <p>“Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.”</p> <p>In this Objective, <b>the County re-brands dense Urban Sprawl as a desired attribute.</b> The General Plan Alternative does not meet this objective, because it does not have Urban Density mixed use and senior housing.</p> <p>This Objective is another example of where <b>the County has structured the Objectives of the EIR so narrowly with an intended bias such that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives.</b> This approach leads to a self-serving and biased environmental analysis.</p> <p>Consistency with Objective Seven – <b>THE PROJECT AND ALL ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE CONSISTENT WITH OBJECTIVE SEVEN</b></p> <p>The full text is below:</p> <p>“Provide the opportunity for residents to increase the recycling of waste.”</p> <p>Having an on-site recycling facility is not the sole opportunity to increase recycling of waste. The huge amounts of waste the Accretive Urban Sprawl (AUS) requires creation of a recycling center to reduce trash truck route miles such that the project perhaps marginally complies with Traffic Level of Service on trash day.</p> <p>All of the Alternatives comply with this Objective equally.</p> <p>Objective Eight - <b>THE PROJECT AND MOST ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE CONSISTENT WITH OBJECTIVE EIGHT</b></p> <p>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 Operations Office located on 32444 Birdsong Drive) on the same or nearby Parcels achieves this</p>	<p>C1s-8 The objectives are consistent with the CEQA guidelines and are not impermissibly narrow. Objective 6 reflects the need in the County for diverse housing. The project offers both attached and detached single-family homes, as well as mixed-use residential opportunities. Senior housing is also a significant housing type in the proposed project. The 468 deed-restricted senior housing units in the development plan comprise 27 percent of the total number of housing units. The County’s General Plan Housing Element Background Report (April 2013) identifies the housing needs of the growing elderly population to require special considerations such as proximity to services and shopping, as well as more affordability, all which can be achieved in the Village-style design of the proposed project. The range of diverse housing types proposed by the project within the jurisdiction of the County of San Diego help to accommodate expected population growth and to assist the County in meeting the requirement to accommodate its fair share of housing for regional population growth as required by Government Code sections 65583 and 65584.</p> <p>The project offers a reasonable range of alternatives, including the General Plan Consistent Alternatives as a means to compare different project designs to the goals of the project.</p> <p>C1s-9 The County agrees with the commenter’s concern, and as a result the FEIR was revised on page 1-1 to reflect the removal of this objective.</p> <p>C1s-10 The referenced objective could be achieved at a number of locations where there are enough homes to support the educational, recreational and social uses. A small subdivision or very low density project would not meet this objective. A larger planned community such as those recently approved at the SR-76 and I-15 interchange would meet this objective. This objective is not limiting or exclusive to the project.</p> <p>The FEIR does consider development at General Plan densities, as described in FEIR subchapter 4.4, Analysis of the General Plan Consistent Alternative. The FEIR concludes that the General Plan Consistency Alternative would result in fewer impacts to agricultural impacts as compared to the project.</p>
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LETTER

RESPONSE

Objective **perhaps better than the Proposed 1746 EDU Accretive Urban Sprawl Project.**

C1s-10  
cont.

3 - A valid offsite Alternative – the Downtown Escondido Specific Plan Area (SPA) has been deficiently ignored.

There exists a reasonable off-site CEQA compliant Alternative to this Project – the 1746 EDU and 90,000 sq. ft. mixed use Escondido Downtown Specific Plan Area (SPA) Project.

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 (City of Escondido) General Plan build-out Equivalent Dwelling Unit increase (EDU) of 5,275 EDU plus additional mixed use commercial uses.

Unlike the Accretive Project, the Downtown 1746 EDU Escondido Equivalent 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.

C1s-11

The project has existing medical, school, fire, police, and most importantly, Circulation Element Roads and mass transit. The Air Quality and Greenhouse Gas impacts of siting the project in Downtown Escondido are orders of magnitude less than the proposed project site in rural greenfield agricultural lands.

The impact on Biology, Agriculture, and Community are non-existent. The Escondido Downtown SPA supports a project of equivalent size to the proposed Accretive Lilac Hills Ranch project and is consistent with both the City of Escondido General Plan and the County of San Diego General Plan.

The Downtown Escondido 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 Downtown Escondido 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. The *interim* Escondido Downtown SPA is more complete than the Accretive Lilac Hills Ranch Specific Plan.

C1s-11 The County disagrees that the project is required to include the Escondido Downtown Specific Planning Area (located nearly 15 miles away from the proposed project) as an off-site alternative in the FEIR. The CEQA Guidelines provide several factors that should be considered with regard to the feasibility of an alternative: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control or otherwise have access to the alternative site (if an off-site alternative is evaluated).

The suggested Escondido alternative is outside the jurisdiction of the County of San Diego and is located nearly 15 miles away from the proposed project. This suggested alternative would therefore fail to meet a project objective of providing a range of diverse housing types with the jurisdiction of the County of San Diego to accommodate expected population growth and to assist the County in meeting the requirement to accommodate its fair share of housing for regional population growth as required by Government Code sections 65583 and 65584.

Senior housing is a significant housing type in the proposed project. The 468 deed-restricted senior housing units in the development plan comprise 27 percent of the total number of housing units. The County's General Plan Housing Element Background Report (April 2013) identifies the housing needs of the growing elderly population to require special considerations such as proximity to services and shopping, as well as more affordability, all which can be achieved in the Village-style design of the proposed project.

Also, the applicant cannot reasonably, economically and timely acquire a large of block of parcels under the Escondido alternative that are necessary to develop a comparable project that includes single family detached homes and single-story senior housing. As shown in Figure II-4, page II-12, of the Escondido Downtown Specific Plan, the Escondido Downtown Specific Plan residential areas are comprised almost exclusively of very small legal parcels that are already developed. Those parcels are mostly in separate fee title ownership.

The EIR for this project cannot exclude the Downtown Escondido SPA Alternative and comply with the California Environmental Quality Act.

4 - The Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid are not valid Alternatives

These three "Alternatives" are density variations of the Project. These Alternatives are also not described in enough detail to provide informed Environmental Impact Analysis. Table 1 below displays all of the information provided in the DEIR with the exception of a one page map for each Alternative:

Table 1 - Scant Attributes of 3 Alternates Provided								
Land Use	Project		Reduced Footprint		Reduced Intensity		2.2 C (Hybrid)	
	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/Sq. Ft.
Single Family Detached	158.8	903	142.1	783	275.5	881	177.0	792
Single Family Senior	75.9	468	71.1	468	0		75.9	468
Single Family Attached	7.9	164	0		0		4.3	105
Commercial/Mixed Use	15.3	211	6.0		5.6		15.3	
Water Reclamation	2.4		2.4		2.4		2.4	
RF/Trailhead	0.6		0		0.6		0.6	
Detention Basin	9.4		5.4		5.5		5.5	
School Site	12.0		9.0		0		12.0	
Private Recreation	2.0		0		0		2.0	
Group Residential/Care	6.5		0		0		6.5	
Institutional	10.7		10.7		10.7		10.7	
Park - HOA	11.8		10.0		3.0		11.8	
Park - Dedicated to County	12.0		6.0		9.0		12.0	
Biological Open Space	103.6		168.8		102.7		103.6	
Non-circulating Road	45.7		45.7		41.5		43.1	
Circulating Road	37.6		37.6		21.5		30.0	
Common Areas/Agriculture	20.2		20.2		65.0		45.0	
Manufactured Slopes	67.5		67.5		65.0		50.0	
Other/Accretive Math Error*	8.1		5.5		0		0.3	
<b>Total</b>	<b>608.0</b>	<b>1746</b>	<b>608.0</b>	<b>1251</b>	<b>608.0</b>	<b>881</b>	<b>608.0</b>	<b>1365</b>

\* Table 4-1 from DEIR Chapter 4 Project Alternatives has the indicated arithmetic errors

sq. ft. - Square Feet  
HOA = Homeowner's Association

The major observation from independent experts is that these three Alternative are linear scaled variants of the project with inadequate detail to assess Environment Impact.

These Alternatives are described inadequately. The Applicant's information has

C1s-11 cont.

C1s-12

C1s-11 (cont.)

The applicant would therefore be required to negotiate for and acquire hundreds of separate legal parcels from diverse ownership interests to assemble land for a comparable development project. Also, the existing structures on most of the parcels would have to be demolished, and the operations and uses on those parcels would also have to be relocated at significant cost. Such tasks are unrealistic and infeasible. Please refer to the December 16, 2014 letter from project applicant regarding the Escondido Downtown Specific Plan submitted to the County.

The alternatives included in the FEIR permit informed decision making and public participation because there is enough variation amongst the alternatives that provide a reasonable range. As required under CEQA, the alternatives would avoid or minimize significant impacts associated with the project while also meeting the project objectives. The alternatives are compared to the impacts of the project and are assessed relative to their ability to meet the basic objectives of the project. See, FEIR Table 4-2.

C1s-12 Each of the alternatives cited by the commenter were selected in order to either: (1) avoid or minimize significant impacts associated with the project pursuant to CEQA, or (2) compare potential effects with the General Plan Consistent alternative, which is considered a viable development option for planning purposes. These alternatives permit informed decision making and public participation because there is enough variation amongst the alternatives that provide a reasonable range. As required under CEQA, the three referenced project alternatives would avoid or minimize significant impacts associated with the project while also meeting the project objectives.

The commenter refers to "multiple math errors" but does not specify what these supposed errors are or what the correct numbers should be. FEIR Figures 4-3 and 4-4 provide conceptual land use plans, wherein the development footprint is clearly delineated and the areas of development are clearly labeled with land uses proposed under the alternative. As stated in FEIR subchapter 4.7.1, Alternative 6 is simply a hybrid of the project and the Reduced Intensity Alternative. "The 2.2C Alternative combines both Phases 1 and 2 of the Reduced Intensity Alternative with Phases 3, 4, and 5 of the project."

LETTER

RESPONSE

multiple math errors (refer to Attachment B – Table 4-1 from DEIR Chapter 4 Project Alternatives). The only other information provided is a one page Map that in two Alternatives did not even perform lot allocation (Attachment C- Reduced Footprint Map and Attachment D- Reduced Intensity Map).

This is a deficient level of detail to assess Environmental Impact. There is no definition of Commercial uses and zoning. Despite the naïve arm waving in DEIR Chapter 4, traffic impacts are not linear mathematical relationships. And the list of similar issues to Traffic is very long.

In the interest of brevity, **this is inadequate information to make an informed Environmental decision.**

5 - The Alternatives were not fairly assessed in the DEIR by the Applicant.

Table 2 below rates scoring of Alternatives **against the Applicant's biased eight Objectives**. The rationale for assessing the Project is contained in Item 2. The three variant Alternatives are scored the same as the Project, except for the 2.2C Hybrid Alternative. The 2.2 C Hybrid Alternative includes Senior Housing, so it scores one Objective higher than the other two.

C1s-12  
cont.

C1s-13

C1s-12 (cont.)

Therefore, no additional exhibit is necessary. Each alternative discussion includes an analysis of potential environmental impacts that could occur if each alternative was implemented instead of the proposed project. The potential impacts are compared with those impacts associated with the project along with a comparison of whether the alternatives would meet the objectives set out for the project. The County has determined the Alternatives analysis is adequate and provides sufficient information to allow a comparison to the proposed project as required by CEQA Guidelines Section 15126.6(d).

The commercial uses would be equivalent as those permitted and defined by the project, but scaled appropriately for each alternative. As stated in FEIR subchapter 1.2.1.3, the project would include 90,000 square feet of specialty commercial and office uses. As stated in the Specific Plan, the types of permitted and conditional commercial uses will be regulated by the County's existing C34 Use Regulations (refer to County Zoning Ordinance Section 2340).

C1s-13 The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider. No additional response is necessary.

TABLE 2 - COMPARISON TO PROJECT OBJECTIVES								
Objectives	Project	Alternates						
		Downtown Escondido SPA	No Project/No Development	No Project/Legal Lot	General Plan Consistent	Reduced Footprint	Reduced Intensity	2.2 C Hybrid
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.	No	Yes	No	No	No	No	No	No
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.	No	Yes	No	No	No	No	No	No
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.	Yes	Yes	No	No	Yes	Yes	Yes	Yes
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.	No	Yes	No	No	No	No	No	No
5 - Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.	Yes	N/A	No	No	Yes	Yes	Yes	Yes
6 - Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.	Yes	Yes	No	No	No	No	No	Yes
7 - Provide the opportunity for residents to increase the recycling of waste.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
8 - Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>Total Number of Objectives Met</b>	<b>5/8</b>	<b>7/8</b>	<b>2/8</b>	<b>2/8</b>	<b>4/8</b>	<b>4/8</b>	<b>4/8</b>	<b>5/8</b>

C1s-13 cont.

Clearly, the least Environmental Impact *even to these biased Objectives* is the Downtown Escondido SPA Alternative.

Summary and Conclusion

The County's Project Alternatives Analysis in Chapter 4 of the Lilac Hills Ranch DEIR is grossly defective in meeting CEQA requirements.

Objectives 1 and 6 need to be changed to eliminate the bias that the Applicant has intentionally created.

Additional information and studies need to be performed on the Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid Alternatives.

C1s-14

C1s-14 The comment provides concluding comments to the letter. Please see responses to comments C1s-2 through C1s-12. The commenter's opinion and discussion of project concerns is acknowledged and included in the project's FEIR for the decision makers to consider.

LETTER

RESPONSE

The Downtown Escondido SPA Alternative accomplishes the same Objectives as the Project with orders of magnitude less Environmental Impact. This Alternative is fully informed in the City of Escondido Downtown SPA Specific Plan and related documents,

C1s-14  
cont.

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

Attachment A: DEIR Project Objective Issues letter dated July 29, 2013

Attachment B – Table 4-1 from DEIR Chapter 4 Project Alternatives

Attachment C – 1251 EDU Reduced Footprint Map

Attachment D – 881 EDU Reduced Intensity Map

Attachment E – 1351 EDU 2.2 C Hybrid Map

C1s-15

C1s-15 References noted.

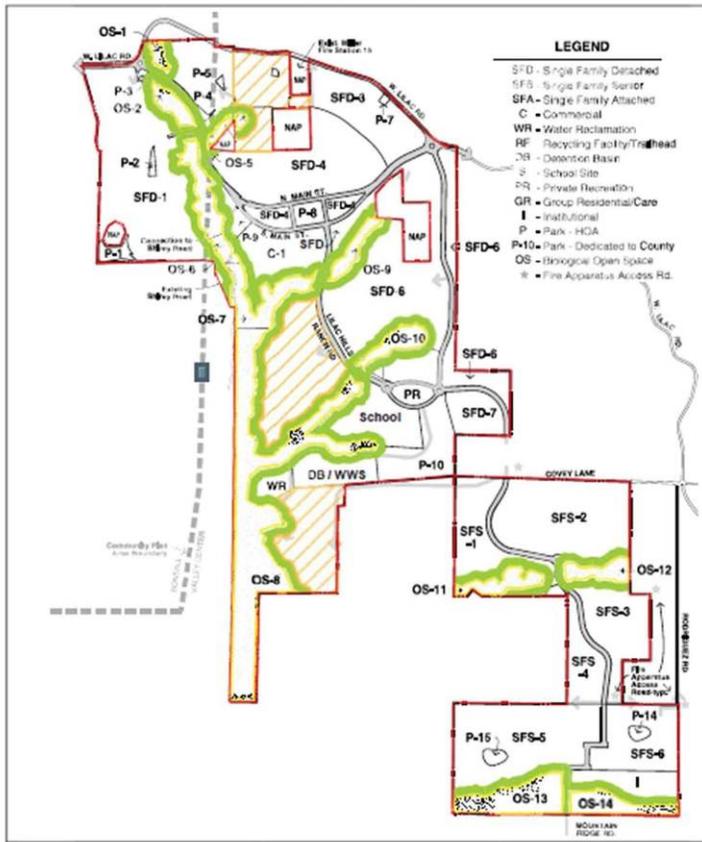
Attachment B – Table 4-1 from DEIR Chapter 4 Project Alternatives

TABLE 4-1  
LILAC HILLS RANCH CEQA ALTERNATIVES

Project Land Use	Alternative													
	1		2		3		4		5		6			
	Gross Acreage	Units/ Sq. Ft.	No Project - Development Gross Acreage	Existing Legal Lots Units/ Sq. Ft.	GPU Consistency Gross Acreage	Units/ Sq. Ft.	Reduced Footprint Gross Acreage	Units/ Sq. Ft.	Reduced Intensity Gross Acreage	Units/ Sq. Ft.	2,2C (Hybrid) Gross Acreage	Units/ Sq. Ft.		
Single-family Detached	158.8	903	606	16	808.8	49	351.4	110	142.1	783	275.5	881	177	792
Single-family Senior	75.9	468	0	0	0	0	0	71.1	468	0	0	0	75.9	468
Single-family Attached	7.9	164	0	0	0	0	0	0	0	0	0	0	4.3	105
Commercial/Mixed-use	15.3	211	0	0	0	0	0	6	0	5.6	0	15.3	0	0
Water Reclamation	2.4	0	0	0	0	0	0	2.4	0	2.4	0	2.4	0	0
RF/Tailhead	0.6	0	0	0	0	0	0	0	0	0.6	0	0.6	0	0
Detention Basin	9.4	0	0	0	0	0	0	5.4	0	5.5	0	5.5	0	0
School Site	12.0	0	0	0	0	0	0	9	0	0	0	12	0	0
Private Recreation	2.0	0	0	0	0	0	0	0	0	0	0	2	0	0
Group Residential/Care	6.5	0	0	0	0	0	0	0	0	0	0	6.5	0	0
Institutional	10.7	0	0	0	0	0	0	10.7	0	10.7	0	10.7	0	0
Park - HOA	11.8	0	0	0	0	0	0	10	0	3.0	0	11.8	0	0
Park - Dedicated to County	12.0	0	0	0	0	0	0	6	0	9.0	0	12	0	0
Biological Open Space	103.6	0	0	0	0	0	256.6	0	168.8	0	102.7	0	103.6	0
Non-circulating Road	45.0	0	0	0	0	0	0	45.7	0	41.5	0	43.1	0	0
Circulating Road	37.6	0	0	0	0	0	0	37.6	0	21.5	0	30	0	0
Common Areas/Agriculture	20.2	0	0	0	0	0	0	20.2	0	65.0	0	45	0	0
Manufactured Slopes	67.5	0	0	0	0	0	0	67.5	0	65.0	0	50	0	0
<b>TOTAL</b>	<b>698.0</b>	<b>1,746</b>	<b>608</b>	<b>16</b>	<b>698.0</b>	<b>49</b>	<b>698.0</b>	<b>110</b>	<b>608</b>	<b>1251</b>	<b>698</b>	<b>881</b>	<b>698</b>	<b>1365</b>

sq. ft. = square feet  
HOA =homeowners association

Attachment C – 1251 EDU Reduced Footprint Map



- Project Boundary
- Boundary of On-site Wetland
- 100-foot Wetland Buffer
- Upland Habitat

FIGURE 4-3  
Reduced Footprint Alternative

LETTER

RESPONSE

From Page 27 of 73 COUNTY OF SAN DIEGO 2011 CONSOLIDATED FIRE CODE 4<sup>th</sup> Edition

**Sec. 503.2.3.1 Surfacing materials.** The minimum surfacing materials required for fire apparatus access roads shall vary with the slope of the roadway as follows:

0-10% Slope	4" Decomposed Granite
11-15% Slope	2" Asphaltic Concrete
16-20% Slope	3" Asphaltic Concrete

The paving and sub-base shall be installed to the standards specified in Section I-M of the County of San Diego Off-street Parking Design Manual. A residential driveway constructed of 3½" Portland cement concrete may be installed on any slope up to 20% provided that slopes over 15% have a deep broom finish perpendicular to the direction of travel to enhance traction.

<p><b>Sec. 503.2.3 Surface.</b> Fire apparatus access road shall be designed and maintained to support the imposed loads of fire apparatus (not less than 75,000 lbs. unless authorized by the FAHJ) and shall be provided with an approved paved surface so as to provide all-weather driving capabilities. The paving and sub-base shall be installed to the standards specified in Section I-M of the County of San Diego Off-street Parking Design Manual. A residential driveway constructed of 3½" Portland cement concrete may be installed on any slope up to 20% provided that slopes over 15% have a deep broom finish perpendicular to the direction of travel or other approved surface to enhance traction.</p>
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Reference: Page 12 of County of San Diego Off-street Parking Design Manual (June 1985)

**12 M. PAVING THICKNESS SCHEDULE AND DETAILS.**

Except for zones subject to the Agricultural Use Regulations, and the S-87 Use Regulations, all parking spaces, loading spaces and driveways serving them shall be hard surfaced with a minimum of 1.5" of hot or cold mixed bituminous surfacing or 3.5" of portland cement concrete; provided, however, that parking spaces and driveways accessory to one-family and two-family dwellings need not be surfaced with a more durable type of surfacing than that which exists on the street which provides access to the lot or building site upon which such dwelling is located. Required surfacing shall be placed on a suitably prepared base. Within the desert areas of the North Mountain, Mountain Empire and Desert Subregional Plan areas, 4 inches of decomposed granite or suitable alternate material may be approved by the Director of Planning in lieu of more durable paving on residential driveways.

REQUIRED THICKNESS OF A/C AND SUBBASE*			
Existing Soil Classifications	Residential General Parking for Autos Serving Not More Than 4 Spaces	Multi-Family Commercial Store Frontage Parking	Commercial Heavy Duty Truck Loading and Parking
<b>GOOD TO EXCELLENT BASE</b> Decomposed granite, well graded sands and gravels which retain load supporting capacity when wet.	2" A/C on existing soil	3" A/C on existing soil	3" A/C on 5" aggregate base or 4" A/C on aggregate base or 5" A/C on existing soil
<b>MEDIUM BASE</b> Silty sands and sand gravels containing moderate amounts of clay and fine silt. Retains moderate amount of firmness under adverse moisture conditions.	2" A/C on 6" of decomposed granite base or 3" A/C on 3" aggregate base or 4" on existing soil	3" A/C on 5" aggregate base or 4" A/C on 3" aggregate base or 5" on existing soil	3" A/C on 7" aggregate base or 4" A/C on 5.5" aggregate base or 6" A/C on existing soil
<b>POOR BASE</b> Soils having appreciable amounts of clay and fine silt. Soils become quite soft and plastic when wet.	3" A/C on 5.5" aggregate base or 5" A/C on existing soil	3" A/C on 8" aggregate base or 4" A/C on 5.5" aggregate base or 6" A/C on existing soil	3" A/C on 12" aggregate base or 4" A/C on 10.5" aggregate base or 8" A/C on existing soil

\*This paving thickness design for A/C paving shall be used unless a pavement design by a registered civil engineer

Attachment D – 881 EDU Reduced Intensity Map

