

LETTER

RESPONSE

Letter C2b

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VIA EMAIL

July 28, 2014

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Subject: DEIR Public Comment to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS 2012-3800-12-001 (GPA), PDS 12-3810-12-001 (SP) – General Plan and Community Plan Inconsistencies

Dear Mr. Slovick –

Inconsistency is evidence that an inconsistent project will have significant environmental effects and if the inconsistency has not been analyzed. The inconsistencies may, or do need to be cured before the project can be approved. Project must satisfy mandatory general plan policy that is fundamental and unambiguous.

The General Plan policies requiring amendment in order to accommodate this inconsistent project will require revision of the San Diego County General Plan (GP) with appropriate comprehensive environmental review or new GP Environmental Impact Report (EIR) of associated impacts throughout the County.

These and previous comments have challenged the logic exhibited throughout the Specific Plan and now in the DEIR: that amending a particular GP Regional Category to suit the project somehow also reconciles the project's inconsistencies with a wide array of General and Community Plan Goals and Policies.

The proposed SP/GPA is inconsistent in fundamental ways with the San Diego County General Plan and the Bonsall and Valley Center Community Plans. The DEIR is derelict in concluding that "Overall the project would be consistent with the General Plan; therefore land use impacts associated with policy inconsistencies would be less than significant" (DEIR Chapter 3 Environmental Effects Found Not to be Significant p. 3-65). This project creates multiple inconsistencies with the GP the Bonsall and Valley Center Community Plans and a "reasonable person" could not find this project to be consistent with either the GP or the community plans.

C2b-1

C2b-2



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C2b-1

The project is consistent with the General Plan, and the Valley Center and Bonsall Community Plans, of which they are a part. Please refer to Appendix W.

The project does not amend any General Plan policies, or any guiding principles, goals, objectives of the San Diego County General Plan adopted August 11, 2011. The project proposes and would 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, pp.1-2 to 1-3) Such amendments are specific to the proposed project. Since the General Plan Amendment would not amend General Plan principles, goals, objectives or policies, it would not necessitate countywide environmental review of the General Plan Update adopted on August 11, 2011.

C2b-2

The FEIR thoroughly analyzes the potential significant physical impacts resulting from the General Plan Amendment. Please refer to Global Response: General Plan Amendment CEQA Impacts Analysis for a thorough discussion of this topic.

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QUESTION: Why has the DEIR failed to perform the analyses required for decision makers, first, to understand the parameter of this proposal, and second, to appreciate the nature and reach of it impacts it does not have a rudimentary analysis of Consistency with the General Plan?

C2b-3

QUESTION: Why has this plan not met the internal consistency of all County General Plans in California as required by California State Law? The Specific Plan in particular requires amendments to the adopted General Plan, it is crucial to understand exactly where the Specific Plan is inconsistent with General Plan regional categories, land use designation and road classifications, principles, elements, goals and policies.

C2b-4

QUESTION: Why was the Specific Plan not in compliance with CEQA? A DEIR must examine consistency issues including the web of interconnected and mutual-supporting elements, goals, policies and maps of the County General Plan. 14 Cal. Code Regs. Section 15125 (d). The inconsistency requires denial of the project, re-design of the project or amending the General Plan.

C2b-5

QUESTION: Does this mean that all communities will need to make major changes to the Land Use, Mobility and Safety Elements in the San Diego County General Plan to achieve consistency with the proposed Specific Plan and will it require revisiting the environmental impacts of the entire San Diego County General Plan specifically the amendments or will the county invalidate the General Plan based upon internal consistency defects?

C2b-6

QUESTION: The GP, and Community Plans are NOT subordinate to this project's Specific Plan, as the Specific Plan asserts. Why was this statement regarding the GP, and Community Plans allowed to be published as fact? The project will require rejecting the GP's foundational vision of smart growth and eliminating many of its supporting policies.

C2b-7

One of the most glaring inconsistencies is its failure to comply with land use goal LU-1 and Policy LU-1-2.

Land Use Element Goal LU-1.2: Primacy of the Land Use Element. A land use plan And development doctrine that sustain the intent and integrity of the Community Development Model and the boundaries between Regional Categories.

C2b-8

Land Use Element Policy LU-1.2: Leapfrog Development. Prohibit leapfrog development Which is inconsistent with the Community Development Model? Leapfrog Development Restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification (LEED ND) or an equivalent.



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C2b-3 through C2b-6

The project's Specific Plan is compliant with all state and county requirements. Implementation of the Specific Plan assures that the project will be carried out in the way it is intended. See responses to C2b-1 and C2b-2 regarding consistency with the General Plan and internal consistency among project related plans.

C2b-7

General Plan Policy LU-2.2 provides that community plans must be internally consistent with General Plan goals and policies of which they are part. This means that community plans cannot be interpreted to undermine the policies of the General Plan. Likewise, Specific Plans implement the General Plan, and by default the community plans, and so also cannot be interpreted to undermine the policies of the General Plan. Occasionally, gaps or lack of specificity in development and design standards in the General Plan or Community Plan texts will be addressed, in a manner that does not conflict with other plans, through the project-specific refinements to standards that are contained in the Specific Plan.

C2b-8

The commenter states that the project is inconsistent with Policy LU-1.2 of the General Plan. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic.

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This Policy defines, leapfrog development as Village densities located away from established Villages or outside established water and sewer service boundaries. How could the Specific Plan and the statements in the DEIR be consistent with the Land Use Element Goal LU-1.2 or Land Use Element Policy LU-1.2?

The DEIR for this SP/GPA asserts that the project is consistent with GP Policy LU-1.2, but this is clearly not the case. The SP/GPA fails in the most fundamental ways to respect the County's commitment to sustainable development.

- Project is inconsistent with the GP Community Development Model
- Project is inconsistent with LEED ND standards,
- Project is inconsistent with the 3rd requirement for waiving the prohibition on Leapfrog development: provide necessary services and facilities.
- Project requires (10) modifications to County Road Standards to reduce capacities to sub-standard levels
- Traffic is deemed unmitigable by the DEIR and
- Project fails to meet 5 minute response times for Fire & Emergency Medical Services

The proposal, by definition, is inconsistent with the GP as the Community Development Model is not a moveable abstract concept or a complex of planning principles and ideas that are used only when it suits the developer?

QUESTION: The following are additional inconsistencies that are not answered why?

1. Community Development Model requires a "feathering" "buffering" of residential densities from intense Village development
2. Project is located many miles from areas that are employment centers, shopping, Entertainment, medical services, and civic organizations and activities
3. All I need to say is where is the infrastructure for this project with requesting capacities of these roads
4. Why is the Community Plan not being considered? The intent is to intensify development in existing Villages and this framework is ignored in this DEIR
5. The most unbelievable is that the claim that this project is not growth inducing how could anyone with reasonable intelligence not see this as growth inducing? All one needs to do is look at the density on the plan now and then what is proposed understand that this is growth inducing

C2b-8
cont.

C2b-9

C2b-10

C2b-11

C2b-12

C2b-13



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C2b-9 The project meets the feathering requirement (e.g. higher density and intensity of uses in the center of the project with less intense uses at the project periphery) of the Community Development Mode. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic.

C2b-10 The project site is located approximately 2 miles to the east of I-15 and would include commercial and professional service centers and civic use facilities. See FEIR, Figure 4a. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic.

C2b-11 The project proposes the development of a new Village, which would provide infrastructure, utilities, and the availability of goods and services intended to serve the village. The project would be responsible for the construction and improvement of roadways and provision and extension of public facilities, which would be sized to serve the project's population.

C2b-12 The project is consistent with the Valley Center and Bonsall Community Plans. The project would create a new village (as allowed by General Plan policy LU-1.2), and amend the communities plans accordingly. The project's consistency with the Bonsall Community and Valley Center Community Plans is detailed in FEIR Appendix W.

C2b-13 Regarding growth inducing effects beyond the project boundaries, the FEIR in subchapter 1.8 analyzes various factors, including project density, additional housing, roadway construction, public facilities, fire and emergency services, schools, and water and wastewater services, and concludes the project could be growth inducing. However potential impacts are too speculative for evaluation in this FEIR because the specific nature design and timing of future project is unknown at this time.

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6. The project design defies the GP principles, goals and policies for Village development Which the Community Development Model reflects
7. The project will create 8 miles of edge effects that will threaten surrounding agriculture, horticulture and animal husbandry that is designated in area for semi-rural and rural development and is growth inducing
8. The project does not support the "walk-able" claim as housing areas are at least a mile from what the Community Development Model

C2b-14

C2b-15

C2b-16

Please answer clearly each of the above 8 (8) questions.

Accretive SP/GPA is inconsistent with LEED Neighborhood Development Certification standards

This is a critical requirement for this project without meaningful analyses required by CEQA. The DEIR merely asserts compliance with LEED-Neighborhood Development requirement. The County is required to name the standard and show how it is equivalent where is that "equivalent standard" as policy LU1-2 allows?

QUESTION: Please state in writing what the standard the County is using?

Please read the booklet describing the requirement to meet LEED the book is titled LEED 2009 for Neighborhood Development that analyzes consistency, the publication states exacting standards and illustrated in detail. The booklet is published by the U.S. Green Building Council and is available on its website, USGBC.org

The following are requirements for Accretive/Lilac Hills Ranch to achieve LEED ND Certification.

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

C2b-17

C2b-18

QUESTION: None of the fundamental requirements have been meet. Why would the County allow the project to go forward stating that the project will be LEED ND without the analyses?



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C2b-14 All of the goals and policies of the General Plan are based upon the Guiding Principles set forth in Chapter 2 of the General Plan. (General Plan, p.2-6) The FEIR analyzes whether the project meets such principles through a consistency analysis in appropriate subchapters of the FEIR and in Appendix W of the FEIR.

C2b-15 The project is growth inducing to the extent discussed in subchapter 1.8 of the FEIR. See also response to comment C2b-13. The comment gives no specific examples of edge effects to surrounding areas but FEIR, subchapter 2.4 discusses impacts to agricultural resources.

C2b-16 The project is designed to include extensive pedestrian sidewalks and community multi-use trails. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion and analysis of project walkability (e.g., 16 plus miles of tree-lined, lighted, signed, soft base, paths and trails). Please also refer to the Trail Plan included in the Specific Plan on Figure 1-8. The Specific Plan provides in Section II (B) an analysis of project walkability, and describes that the project is zoned so that the geographic center is within one-half mile walk of at least seven projected diverse uses. Among the diverse uses potentially included in the project are the following: grocery store, farmer's market, bank, coffee shop, bakery, drug store, senior care center, gym, recreational center, school, civic offices, public park, and commercial office. These uses would be permitted as part of the designated commercial space allotted for in the Town Center and the Neighborhood Center.

C2b-17 Please refer to the Global Response Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic. Briefly, the project is amending the General Plan by adding new Village that meets the Community Development Model and includes design elements that meet the intention of Policy LU-1.2. The project meets the criteria of Policy LU-1.2 in the following ways:

- The land use of the project reflects the Community Development Model. (REIR, Subchapter 3.1.4.2, Land Use Planning, p. 3-87-89; Technical Appendix W, Att. A, pp. 1-2; Specific Plan, Part II.G, pp. II-38-40);

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	<ul style="list-style-type: none"> • The project is located within existing water and sewer service district boundaries (REIR, Subchapter 1.8.4., p. 1-47 and the Specific Plan, Part I.E.2. Water Resources, p. 1-7; and • The project is designed to be LEED-ND equivalent. Please see the Global Response: Project Consistency with General Plan Policy LU-1.2. <p>C2b-18 The General Plan Policy LU-1.2 does not require the proposed project to be LEED-ND certified. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion of this topic.</p>
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QUESTION: Why does the DEIR not discuss and analyze the GP Guiding Principles (GP pp. 2-6 through 2-15), but merely cursorily sets them out and in some cases, without analysis of the factual aspects of the Accretive project, asserts compliance? Please answer all of the Guiding Principles and how this project meets them.

Guiding Principle 1: Please answer how this project supports a reasonable share of regional population growth? (GP p. 2-6)

Guiding Principle 2: Please answer how this project promotes health and sustainability by locating new growth near existing and planned infrastructure, services and jobs in compact pattern of development?

Guiding Principle 3: Please answer in detail how this project can reinforce the vitality, local economy, and individual character of existing communities when planning new housing employment, and recreational opportunities?

Guiding Principle 4: Please answer how this project promotes environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance? (GP 2-10)

Guiding Principle 5: Please answer in detail how this project ensures that development accounts for physical constraints and the natural hazards of the land. (GP 2-11) How does bulldozing 4 million cubic yards of natural hills to make manufactured slopes meet this principle?

Guiding Principle 6: Please provide information on how the project will provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation?

Guiding Principle 7: How does this project maintain environmentally sustainable communities and reduce green house gas emissions that contribute to climate change? (GP p. 2-12)

Guiding Principle 8: How does this project preserve agriculture as an integral component of the region's economy, character, and open space network? (GP p. 2-13)

Guiding Principle 9: How would this project minimize public costs of infrastructure and services and correlate their timing with new development? (GP p. 2-14)

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C2b-19 The project complies with Guiding Principle 1. The project will help contribute to the County-wide need for housing. The General Plan has directed growth to certain areas within the community planning areas of Valley Center, General Plan Policy LU-1.2 provides flexibility to the General Plan to accommodate population increases as necessary in a manner that meets the requirements of the Sustainable Communities Strategy of the General Plan. (consistent with Assembly Bill 32) The General Plan clearly allows for future amendments to the Land Use Map and Regional Categories Map. The General Plan and Community Plans are not subordinate to the project's Specific Plan The project is amending the General Plan by adding a new Village that meets the criteria of Policy LU-1.2 and would provide housing within the Valley Center and that would contribute to the forecasted growth of Valley Center.

C2b-20 The project complies with Guiding Principle 2. The project is amending the General Plan by adding a new Village in accordance with the criteria of Policy LU-1.2. The project is a new Village whose structure, compact design and function are based on the Community Development Model. (FEIR, subchapter 3.1.4.2, Land Use Planning; Technical Appendix W, Att. A, pp. 1-2; Specific Plan, Part II.G, pp. II-38-40); the project is located within existing water and sewer boundaries as plainly disclosed in the FEIR, subchapter 1.8.4. and the Specific Plan, Part I.E.2. Water Resources, p. 1-7; and, the project is designed to be LEED-ND equivalent in that is incorporates the principles of smart location and linkage, neighborhood pattern and design, and green building and infrastructure through application of numerous "green building practices." (See Global Response: Project Consistency with General Plan Policy LU-1.2 for a more detailed discussion on these topics.)

The project includes several methods of transitioning from the denser uses onsite to the less dense uses surrounding the property. These include the use of the biological open space to separate the project from adjacent uses and buffers where adjacent to existing agricultural areas. The Specific Plan also requires the use of wider lots and certain grading techniques to further separate the project from adjacent uses. The Project is anchored by a pedestrian-oriented, mixed-use Town Center that includes high-density residential, commercial and professional offices, various private and

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	<p>C2b-20 (cont.)</p> <p>public facilities, a park and the community trails. Compact residential neighborhoods radiate out from the Town Center towards the Project perimeter and support several small parks and the community trails. Neighborhood centers include clusters of attached homes, commercial and professional uses, a 13-acre public park and the community trails. The project perimeter transitions to surrounding semi-rural areas by featuring: wider, ranchette-style lots, a 50-foot wide orchard-planted buffer, a 104 acre natural preserve, and the community trails. The road network is densest at the Town Center and there are over sixteen miles of landscaped, lighted, and signed multi-use community trails stitching every part of the community together and connecting to county regional trails. (See Specific Plan, Part V.B)</p> <p>C2b-21</p> <p>The project complies with Guiding Principle 3. The project would increase the local economy and vitality of the community through its introduction of new services and amenities for the community to share. The project includes three commercial areas that will provide small scale commercial/retail uses as detailed in Chapter 1.0 of the FEIR and throughout the Specific Plan. While these small commercial areas would increase the economy of the community surrounding the project site, it would not interfere with the vitality of the existing areas. The project is located approximately 10 miles away from the town center of Valley Center and 6.5 miles from the town center of Bonsall. It is unlikely the commercial areas within the project site would take business away from the villages as this is quite far for residents in and around the villages to travel on any regular basis. Therefore, the project will not hurt the existing village businesses.</p> <p>Section 4.1 of the TIS describes the commercial center as consisting of commercial retail uses which may include a 25,000-square-foot general store-local serving, small scale and boutique style specialty retail nothing of the nature that would raise the issue of blight as may be suggested by the commenter. The potential for commercial uses in the project blighting other parts of the community planning areas is too speculative. The commercial uses intended for the project will be sized to meet the needs of the project.</p>
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	<p>C2b-22 The project complies with Guiding Principle 4. The Project design incorporates the preservation of 104.1 acres of open space, the on-site creation of 6.0 acres of wetland habitat for wildlife use, and the enhancement of 12 acres of existing disturbed riparian habitat to native riparian habitat for wildlife use. See FEIR, subchapter 2.5 and Biological Resources Report, Section 8.0 and Table 10.</p> <p>C2b-23 The project complies with Guiding Principle 5. The project accounts for the physical constraints and natural hazards of the land. With respect to grading, the overall shape of the land would remain intact as shown by the grading cross-sections included as Figure 68 in the Specific Plan. Grading in all phases, including off-site improvements, would comply with the Landform Grading Guidelines contained in the Specific Plan which will include the blending and rounding of slopes, roadways, and pads to reflect the existing surrounding contours by undulating slopes and replicating the natural terrain. The FEIR includes conceptual grading plans showing how the grading would adhere to existing landforms and contours. (See also comment C1e-56 above.) With respect to other physical constraints and natural hazards: approximately 91 percent of the RPO 'steep slopes' are avoided and flood prone areas within the project are located in open space. The Fire Protection Plan analyzes the potential fire safety issues of the project area and includes detailed fire prevention measures that have been incorporated into the project design.</p> <p>In addition a 50 to 100 foot wide fuel modification zone is provided around the internal perimeter of the property and along natural open space areas as required by the Fire Protection Plan. Additional measures are included to ensure that safety is not compromised in those areas in which the 100 feet wide fuel modification zone is not met and require the approval of the Fire District. (see FEIR Figure 1-6), Ignition resistant construction provides additional safety.</p>
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	<p>C2b-24 The project complies with Guiding Principle 6. The project will enhance the connectivity of the County's transportation network and provides a transportation system that supports public transportation. The Project's circulation network was designed to accommodate the public traveling from the adjacent public road system while maintaining the rural atmosphere and rural theme of the surrounding Community. The project will make improvements to widen West Lilac Hills Road . Although the transportation system in the unincorporated areas of the County will rely primarily on the public road network, the Specific Plan reserves a site for a future transit stop in the Town Center that could be utilized when the Community reaches a point in its development in which the NCTD system will be able to provide transit service. The project includes a Transit Demand Management Plan that ensures project linkage to the regional transit system through implementation of an interim plan and through long-term coordination with regional transportation agencies. In addition, the TDM includes an interim transit service to transport residents to the nearest transit stop until the NCTD establishes a transit route to the project.</p> <p>C2b-25 The project complies with Guiding Principle 7. The project meets the requirements of sustainable development. The underlying premise of the General Plan is to conserve natural resources and develop lands and infrastructure more sustainably in the future. (General Plan, p.1-16) The General Plan identifies such goals and policies that contribute to achieving this premise as listed in Table I-1.</p> <p>The FEIR analyzes whether the project meets all of the relevant policies listed in Table I-1, including the "sustainable development" linchpin principles of LU-1.2 and the Community Development Model, as described throughout each of the appropriate subchapters of the FEIR and in Appendix W to the FEIR.</p>
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	<p>C2b-26 The project complies with Guiding Principle 8. Although the project would convert approximately 384 acres of existing agricultural lands to non-agricultural uses, the project would not conflict with this Guiding Principle or adjacent agriculture because agriculture would remain a vital part of the region's economy, character and open space network. As discussed in FEIR subchapter 2.4, approximately 20.3 acres of common area would be available for agriculture activities within the project site and 43.8 acres of agricultural would be acquired off-site and placed within permanent agricultural conservation easements. The open space easements would preserve the land for agricultural conservation purposes in perpetuity. The project site would also be surrounded by semi-rural and rural lands intended for agricultural operations, which would be protected through on-site agricultural buffers, including restrictions on the placement of structures, and fencing. The agricultural buffers would include restrictions on aerial pesticide application, dust generation, and noise from agricultural equipment. The buffers would be adequate to ensure that off-site impacts to agriculture are less than significant (see Mitigation Measures M-AG-2, 3, and 4). The General Plan policies cannot be applied independently, but balanced with one another. Although the project would convert existing agricultural uses to non-agricultural uses, the project would contribute to the objectives of Guiding Principles 1, 2, 4, 5, 7, and 9, as discussed herein.</p> <p>C2b-27 The project complies with Guiding Principle 9 because it is a mixed-use, sustainable, compact planned community located in close proximity to existing and planned infrastructure and services. Because of its' compact design it requires a less extensive road network and infrastructure to meet its' needs. The project is located within the Valley Center Municipal Water District and the Deer Springs Fire Protection District. The overwhelming majority of the streets within the project are proposed as private streets but are built to ensure that emergency and safety vehicles can easily access all parts of the new Community. As private streets they will be maintained by the project HOA, and will not therefore require any public costs for their maintenance and upkeep. Services will be phased to ensure they are available when needed. The cost of services will be borne by the residents of Lilac Hills Ranch.</p>
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	<p>C2b-27 (cont.)</p> <p>Infrastructure and public services will be paid for by the developer or through a financing mechanism that is applied only to the residents of Lilac Hills Ranch. Payment of transportation impact fees, school fees and other similar fees will ensure that the cost to the public is minimized. Recreation and school facilities will be closer, potentially eliminating or reducing long bus rides for children.</p> <p>Lilac Hills Ranch also implements this principal in that it includes a number of innovative new technologies seldom seen in County development proposals. A wastewater recycling facility will provide reclaimed water for irrigation. Additionally, an on-site recycling facility will provide additional opportunity for residents to sell their recyclable materials.</p>
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Guiding Principle 10: Please explain how this project recognizes community stakeholder interests while striving for consensus? (GP p. 2-14)

QUESTION: PLEASE EXPLAIN IN DETAIL WHY THE COUNTY PLANNING STAFF IDENTIFIED 121 GP POLICY CONFLICTS WITH THIS PROJECT IN THE SCOPING LETTER. THESE CONFLICTS ARE NOT ANALYZED IN THE DEIR OR THE SPECIFIC PLAN?

QUESTION: There are limited consistency analysis statements that appear in the DEIR however they are incomplete and insufficient please explain why?

In the plan amendment the first item to be changed is the Regional Land Use Element Map and will convert semi-rural SR-4 (one dwelling unit per 4, 8, or 16 gross acres-slope dependent) and semi-rural SR-10 (one dwelling unit per 10 or 20 gross acres – slope dependent) parcels into village residential VR 2.9 (up to 17 dwelling units per acre) and village core C-5 land uses with commercial and urban densities.

QUESTION: Why would this amendment item be allowed as these kinds of land uses aren't permitted in Bonsall?

The second change is to be made to the Bonsall Community Plan Map (a component of the General Plan). The land uses must be changed from agricultural and rural residential to urban uses. There is no other way for the project to be consistent with the Bonsall Map. Our plan has all of our GP approved village uses along Highway 76 miles from this project and we do not have any urban uses in the Bonsall Community Plan.

QUESTION: Why after 13 years of working with the County and the member of the Bonsall community would staff assume that we would approve an urban use on agricultural land?

The SP/GPA text, and the original Draft Environmental Impact Report (DEIR 2013) and now in the REVISED DEIR (DEIR 2014) CLAIMS THAT A CHANGE OF Regional Category – from Semi Rural to Village - magically reconciles the project's inconsistencies with the intent of the Community Development Model please explain in detail how this was achieved? This project as submitted was inconsistent and remains inconsistent why has it not be denied? San Diego County's mandate in its performance of CEQA's purpose is not to deny inconsistencies in order to avoid analysis and ease approval of the project. How can staff honestly reckon this and state it would **be less than significant?**

The project is inconsistent with the General Plan Vision, Guiding Principles the Community Development Model the Goals and Policies that are meant to implement these ideas across the GP the CP and eight elements within the documents: Land Use, Mobility, Conservation and Open Space Housing, Safety, Agricultural and Noise

QUESTION: Explain how can this be less than significant?



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C2b-28 The project complies with Guiding Principle 10. The project was forwarded to the stakeholders and community groups for review as appropriate throughout the process and the project was redesigned to address the comments as appropriate. In addition, numerous public meetings were held by the applicant and the County for community residents to provide information about the project. The project reflects the input that was received at these numerous meetings. For example, following input from the Community Planning Groups, additional parks were added and the large public park was expanded.

C2b-29 The project is consistent with General Plan as discussed at response to C2b-1. Please refer to subchapter 3.1.4 Land Use and Appendix W of the FEIR for a comprehensive discussion of the project's consistency with specific policies.

C2b-30 The FEIR thoroughly analyzes project consistency with the General Plan. Please refer to response to comment C2b-1. CEQA requires an EIR to include 'a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences.' Furthermore, 'the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible' (CEQA Guidelines Section 15151). Reviewing courts will resolve any disputes regarding the adequacy of an EIR analysis in favor of the lead agency if there is substantial evidence in the record supporting the EIR's approach. (Laurel Heights Improvement Assn v. Regents of California (1988) 47 Cal.3d 376) CEQA Guidelines 15384 defines substantial evidence to mean enough relevant factual information from which reasonable inferences can be drawn.

C2b-31 The General Plan states on page 1-15 that it is intended to be a dynamic document and Policy LU-1.2 permits new villages that meet the criteria of the policy. Therefore, the language in the General Plan clearly allows for future amendments to the Land Use Map and Regional Categories Map. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W for a thorough discussion on this topic.

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	<p>C2b-32 The comment expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.</p> <p>C2b-33 The project is wholly consistent with the General Plan (response to comment C2b-1), with the General Plan Principles (response to comments C2b-19 to C2b-28), and with the Community Development Model (response to C2b-17).</p>
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This project does not meet the County General Plan in its "Smart Growth" intention as Smart Growth located future development in areas where infrastructure is established; AND on the other hand, Smart Growth also is to retain or enhance the County's rural character, economy, environmental resources, and unique communities.

QUESTION: How does this project achieve this intention?

The Accretive SP/GPA is inconsistent with assigned Regional Categories and the adopted application of the Community Development Model and does not meet exemption criteria.

QUESTION: The DEIR 2014 suggests that the GP Community Development Model has no significant effect and can be consistent with the existing General and Community Plans by re-categorizing this site it just eliminates the need to analyze any planning impacts how can that be? Does that mean that the adopted Regional Categories and plans for the communities of Bonsall and Valley Center have any effect on these communities? The DEIR 2014 denies the existing planning condition that is supposed to analyze against this proposal to amend it how can that be achieved?

New "Villages" is INCONSISTENT with this project and can only be achieved by amending the adopted General and Community Plans to fit the project.

QUESTION: Please identify and analyze why staff denied the impacts?

As in the DEIR 2014 the assertion "without a shred of evidence" that the new condition is consistent with the Community Developmental Model and then leaps from this assertion to the next assertion that the consistency with all the Goals and Policies is inferred by consistency with the Model.

QUESTION Explain in detail how this is logical and what process of thinking was used BASED ON THE GP STATEMENT BELOW?

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

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



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C2b-34

C2b-35

C2b-36

C2b-37

C2b-38

C2b-34 The project meets the criteria of Policy LU-1.2 which allows the establishment of new Villages that meet the policy criteria. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

C2b-35 The project would amend the Regional Land Use Category to designate a new village consistent with the General Plan and Land Use Policy 1.2, as discussed responses to comments C2b-1, C2b-31 and C2b-17. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

C2b-36 The project would amend the Regional Land Use Category to designate a new village consistent with the General Plan and Land Use Policy 1.2, as discussed responses to comments C2b-1, C2b-31 and C2b-17. Regarding CEQA analysis of physical impacts resulting from the General Plan Amendment, please refer to Global Response: General Plan Amendment CEQA Impacts Analysis for a thorough discussion of this topic.

C2b-37 The project would not amend General Plan policies as discussed in response to comment C2b-1. The project is consistent with Policy LU-1.2 as discussed in response to comment C2b-17. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

C2b-38 Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

The existence of two villages in Valley Center does not preclude the designation of a new village that meets the criteria of Policy LU-1.2. To assert otherwise would preclude the development of new villages. This would limit the Board of Supervisors discretion to determine how to accommodate future growth. The General Plan on page 1-15 states that it is intended to be a dynamic document and there are numerous policies in the General Plan that accommodate planning for future growth, such as M-2.1 (require development projects to provide road improvements), M-3.1 (require development to dedicate right-of-way), S-3.1 (require development to be located to provide adequate defensibility) and COS-2.2 (requiring development to be sited in least biologically sensitive areas).

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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.

C2b-38
cont.

The next criteria the Accretive SP/GPA is inconsistent with is LEED Neighborhood Development Certification standards. In prior comments in this documents Bonsall states compliance with LEED-Neighborhood Development requirements have not be meet. The County must comprehensively address numerous and exacting requirements of LEED Neighborhood Development Certification. **QUESTION: If the County is applying not LEED ND but an "equivalent standard" as policy LU 1-2 allows, the analysis should name the standard and show how it is equivalent where is the "equivalent standard" analysis? This project does not meet the LEED Neighborhood Development Certification as I have mentioned in this document please explain your theory of how this project meets the legal definition of LEED ND?**

C2b-39

Part of the criteria that Accretive SP/GPA fails to provide is Roads for the traffic impacts which will be significant. Why would the County allow the applicant to request 10 (10) modifications to REDUCE the road standards yet expand the capacity to a sub-standard level? **QUESTION How does the County consider this option for the project please explain in detail the rationale behind this significant impact to our communities?**

C2b-40

The projects fails to meet the required 5 minute response time for Fire and Emergency Medical Services and documentation is provided by Deer Springs Fire Protection District as well as their comments in writing that none of the proposed options listed in the Specific Plan and Fire Protection Plan are feasible solutions for the District. **QUESTION: How does the County Fire Authority rationalize this major concern and comments from the local district?**

C2b-41

The proximity of Rural Lands and being in the SRA the project presents wildfire threats which has not been adequately mitigated. The two story structures and EMS hazard potential in a wildfire has barely been mentioned in the documents. Once again Deer Springs Fire Protection District has gone on record three times stating that DSFPD has major issues with the project as proposed. **QUESTION: What has happened to Public Safety and the State Fire Code with this project?**

C2b-42

QUESTION: Please explain why the project fails to present a legal and viable point design for sewage and waste water treatment?

C2b-43



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C2b-39 The project is LEED-ND equivalent, as described in response to comment C2b-17. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

C2b-40 The design exceptions that are being proposed (final recommendations of the requests are pending) as part of this project are described in Figures 1-4A and 1-4B. The resulting effects on roadway capacity of each of the design exceptions are also described the TIS. All of the exceptions being requested for the roadway improvements, were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions could be granted by the County where capacity and safety are not unduly affected. (FEIR, subchapter 2.3.2.3.) Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that overall the road network design for the project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant.

None of the proposed exception requests to road standards would affect the capacity of the roadways (see, Subchapter 1.2.3 of the TIS) The project also includes a Road Design Alternative in Chapter 4.0 of the FEIR that evaluates the proposed project without each of the exception requests. Ultimately, the Board of Supervisors will decide whether to approve the proposed project or one of the project alternatives.

C2b-41 Please also refer to the Global Response: Fire and Medical Services for a thorough discussion of this topic.

C2b-42 For a discussion regarding EMS and structural fires please refer to comment O3e-18, see also Global Response: Emergency Services (Fire and Medical Services). With respect to Fire Code compliance; please refer to RTC C2b-170 for a discussion regarding the project's compliance with applicable Fire Codes and standards. The project must and will comply with all applicable provisions of the State Fire Code, as discussed throughout the FPP. Please also refer to the Global Response: Fire and Medical Services concerning providing emergency services to the project.

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RESPONSE

	<p>C2b-43 Project water and wastewater service design guidelines and standards are in the Specific Plan, Subsection I of Chapter III and the corresponding locations are illustrated in Figures 52 through 59. The REIR analyzes water and wastewater service in Chapter 3.1.5. and is supported by technical appendices Appendix S (Wastewater Alternatives Report) and Appendix T (Water Service Report).</p>
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The project does not support the Guiding Principle 1. Support a reasonable share of regional population growth.

Apparently, the folks who wrote this section of the RDEIR have not lived in southern California for long, are unaware of the history of development here and/or do not understand the need to consider growth inducement. The DEIR version from July 2013 made the statement that “While the project site and surrounding areas are not identified in the General Plan for growth, it is a location where such growth is likely to occur because the project area can accommodate the growth.” Such tortured, circular logic makes any reasonable explanation for the conclusion unattainable. But, it is emblematic of the kind of obtuse logic that is used throughout the RDEIR in 2014. Growth can occur anywhere we choose to place it. We, as a community, make such determinations about the location and types of growth based on land use planning, zoning and community consensus. That is how we arrived at the General Plan [it took 12 years and \$18.6 million to do it]. To ignore the General Plan simply because growth can occur at a given place begs the question why have a General Plan at all?

QUESTION: Please explain how this conclusion was reached? The California legislature reasonably concluded that each county must have a general plan to guide growth, hopefully logically, but at least, in an ordered way. Prospective property owners are able to go to the General Plan to determine what kind of development is likely to occur around the property they wish to buy. That kind of research is useless if the General Plan can be drastically changed before the ink is dry on its first printing.

The Project fails to meet the criteria of a village as defined in the General Plan. It is neither compact [generally 2-miles long by 1-mile wide with a perimeter that would make an amoeba proud] nor is it, “...where a higher intensity and a wide range of land uses are established, or have been planned.” The General Plan and community plans recognize the Project site as low-density agricultural land that is between the two established communities of Valley Center and Bonsall, and designate it to remain that way.

The Project will require the “extension” of several public services. While water for irrigation of the presently agricultural land within the Project can be converted for the Project’s use, there is no existing sewer infrastructure on or near the site. The applicant is asking for a possible package plant on-site with possible connections to the Lower Moosa Canyon Water Reclamation Facility some distance away. That facility will have to be upgraded substantially to tertiary treatment standards to furnish the needs of the Project. The upgrade will require a new permit from the Regional Water Quality Control Board. **HOW would growth not be induced by such an enlargement of and upgrade to the facility? Please explain how you reached the conclusion that this action would not create higher density in the surrounding area?**

QUESTION: Please clarify why expansion of the LMWRF caused by the Lilac Hills Ranch project is not growth inducing in 2014, as the County found it to be in 1996? Does the County now reject the example that it cited in CEQA that expansion of infrastructure removes obstacles to population growth and is, therefore, growth inducing?

C2b-44

C2b-45

C2b-46

C2b-47



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C2b-44 The project is consistent with the General Plan as described in response to comment C2b-1.

C2b-45 The project meets the criteria of compact development as demonstrated by its consistency with Policy LU-1.2, as discussed in response to comment C2b-17. The project establishes a wide range of land uses, as shown in the FEIR in Figure 4a. The REIR discusses proposed land use in FEIR subchapter 3.1.4. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

C2b-46 and C2b-47

Regarding growth inducement, the FEIR in subchapter 1.8 analyzes various factors, including project density, additional housing, roadway construction, public facilities, fire and emergency services, schools, and water and wastewater services, and concludes the project could be growth inducing due to the intensification of uses on-site, lower fire response times to the vicinity, and expansion of water and sewer infrastructure. However, potential impacts are too speculative for evaluation in this FEIR at this time.

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Further, the County has not demonstrated that Sewer Service can be provided for the proposed Project in the time frames that the Lilac Hills Ranch Project requires service, nor has it quantified the Environmental Impact of providing Sewer service please explain why this was not done?

C2b-48

The RDEIR 1.8.5 Conclusion rightly notes that the intensification of land uses on the Project site will encourage intensification on agricultural land uses in the immediate vicinity. Agriculture will not be able to operate as efficiently with the scores of sensitive receptors presented by the project limiting processes and procedures that are essential for efficient and cost competitive production. The inefficiencies resulting from the sensitive receptors and inadequate agricultural buffers for the Project will incline the farmers to calculate the potential profit to be gained by changing the land use designation and densities for their properties and to sell out.

C2b-49

QUESTION: How is that not growth inducement?

This project is unnecessary growth that is outside the needs expressed in the General and Community Plans through the year 2050, this Project will, indeed, be growth inducing in the surrounding area. If approved, this Project will be cited by future projects proposed for its borders and environs as justification for extension of urban densities in the rural areas of Valley Center and Bonsall. In fact, this Project's Specific Plan cited the presence of several other clustered developments north and south of its location along the I-15 corridor as a legitimate, consistent basis for approving the Lilac Hills Ranch project. Yes, this is how growth inducement works.

C2b-50

QUESTION: How does the County see it any other way?

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

C2b-51



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C2b-48 The project would be served by the VCMWD as indicated in the FEIR at Appendix R. The FEIR analyzes wastewater treatment service options in subchapter 3.1.5., supported by Appendix S (wastewater alternatives).

C2b-49 through C2b-51

The project would be growth inducing as discussed in response to comment C2b-13, and C2b-46 and 47; however, potential impacts are too speculative for evaluation in this FEIR at this time.

BONSALL COMMUNITY SPONSOR GROUP*Dedicated to enhancing and preserving a rural lifestyle***Table 1-2 Bonsall and Valley Center Composite Housing Unit Analysis**

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

C2b-51
cont.

PLEASE EXPLAIN THE GROWTH INDUCEMENT OF THIS PROJECT THAT WOULD CREATE THE NUMBERS THAT ARE ABOVE AND BEYOND THE HOUSING UNIT ANALYSIS AS STATED IN THE GENERAL PLAN?

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

QUESTION: Please explain in detail why this project is being considered?



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

Comment-INCONSISTENT: This is another demonstration of the interwoven fabric of the GP. Densities and lot sizes reflect community character. Bonsall's community character is primarily rural, exemplifying the Community Development Model at the heart of the GP. Urban densities and lot sizes proposed by this Project are inconsistent with the Semi-Rural land use designations established by the GP and CP for this area.

QUESTION: Why is this project allowed to proceed with urban densities with clear statements in the GP against this type of project?

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

Comment-INCONSISTENT: This is yet another demonstration of the interwoven fabric of the GP. Requiring projects to comply with the applicable Community Plan is the most effective way to meet the GP Goal LU-2, to maintain the county's rural character. Bonsall's community character is primarily rural, exemplifying the Community Development Model at the heart of the GP. This Project is inconsistent with the Semi-Rural land use designations established by the GP and CP for this area, as well as all the Guiding Principles, as previously pointed out.

QUESTION: The clear description of the Regional Category or Land Use Designation described in LU-2.4 does not allow this type of project to be consistent with the GP or CP's why is this project allowed to move forward?

LU-5.3 Rural Land Preservation: "Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations."

Comment-INCONSISTENT: If this Project proposed development consistent with its existing Land Use Designations, it would still be required by this provision to "preserve," not destroy. The proposed project destroys even more open space, agricultural lands, wildlife habitat and corridors, and watersheds than it would be allowed with consistent development, by its urbanized design, density, and size, as previously pointed out. Urban densities and lot sizes proposed by this Project are inconsistent with the Semi-Rural land use designations established by the GP and CP for this area.

QUESTION: Please explain how the County can see this project as consistent with LU-6.3?

C2b-52

C2b-53

C2b-54



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C2b-52 FEIR subchapter 3.2.4 has been clarified after public review to explain that the project site is currently a mix of undeveloped open space, agricultural uses and rural residences. The project site is located along the western fringe of the rural community of Valley Center. On site, the project site consists of rural residential uses and agricultural land. Although the proposed Project would not divide an established community, the project addressed its relationship to existing and planned land uses with adjacent properties. Subchapter 3.1.4.2 evaluated the Project's compatibility with surrounding off-site land uses and the Project's internal compatibility with existing and planned land uses on site. Compliance with the goals and policies of both Valley Center and Bonsall community plans are detailed in the General Plan Consistency Analysis (see Appendix W) and in subchapter 3.1.4.2. Compliance with the project's design guidelines and other provisions of the Specific Plan assures the project's compatibility with the adjacent off-site land uses and within the project. Overall, the project is consistent with the relevant policies of both the Bonsall Community and Valley Center Community Plans and land use impacts associated with policy inconsistencies would be less than significant.

The community character of both the Valley Center and Bonsall is acknowledged as rural communities with relevant goals within each community plan addressing interest in preserving the rural character of the planning areas. Specifically, Goal 1 of the VCCP Community Character Goals is to preserve and enhance the rural character of Valley Center. The project proposes many different densities and architectural styles, integrated into a cohesive community through landscaping, trails, and a Town Center to provide community focus. The Design Guidelines and other provisions of the Specific Plan assure that monotony in design is avoided. The proposed project further assures consistency with relevant policies associated with this goal through the requirement for Site Plan review by the Valley Center Design Review Board. Additionally, BCP Policy LU-1.1.1 requires development in the community to preserve the rural qualities of the area.

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	<p>C2b-52 (cont.)</p> <p>Conformance to this policy is reflected through the varied land uses proposed within the project site including different patterned homes, the maintenance of on-site agriculture within biological buffers and common areas, and small village commercial centers. Additionally, the project places the highest density of homes closest to the center of the site, furthest from adjacent agricultural operations. Developing the village in this manner would provide housing needs in a compact village design.</p> <p>Finally, as detailed in the Agricultural Resources Report (see Appendix F of the FEIR), one of the project's objectives includes the recognition of the existing rural atmosphere of the surrounding area through use of agriculture on-site and provision of transitional features to provide adequate buffering between types of residences and active agriculture. The Specific Plan includes agriculture throughout the project site, biological open space, and manufactured slopes. HOA-maintained agricultural open space would be retained along many of the boundaries of the project site, as agricultural compatibilities buffers including groves of orchard trees, such as avocado and citrus. Other agricultural-related commercial uses may also be established by the project as allowed in the C-36 zones. Project grading would conform to the natural contours of the land and would not substantially alter the profile of the site as shown by the grading cross-sections included as Figure 68 in the Specific Plan. Please also refer to Appendix W.</p> <p>C2b-53 See response to comment C2b-52 above.</p> <p>C2b-54 The project is consistent with the intent of LU-5.3. With respect to consistency of the project with project density and sizes, Policy 5.3 is not applicable to the project because the policy is concerned with "permitting development under the Rural and Semi-Rural Land Use Designations." The project is requesting a General Plan Amendment approval of which would result in a change in Land Use Designation from Semi-Rural to Village. Please refer to response to comment C1c-136 regarding consistency of project density and lot sizes with the community character. Please refer to FEIR, Appendix W, for a discussion of project consistency with General Plan Land Use policies.</p>
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LU-6.1 - Environmental Sustainability: *"Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment."*

Comment- INCONSISTENT

There have been thirteen (13) Group 1 animal 'species of concern' observed on the Accretive project site. They include lizards, snakes, raptors, small mammals, large mammals and passerine birds. Most of the wildlife surveys conducted focused on the proposed open space areas, brushing over the considerable land area devoted to agriculture as being disturbed. Of the 608-acres on the Project site, 504-acres will be graded, cut and filled, for the construction of the Project.

The DEIR acknowledges the significant impact to these 13 species [and presumably to other species numerous enough not to be of concern], and particularly the raptors [white-tailed kite, Cooper's hawk, turkey vulture] and the loss of 504-acres of foraging area [including agricultural areas]. The DEIR dismisses this loss with 81.7-acres of on- and off-site mitigation area [presumably already populated by members of these species with whom the Project's individuals will compete], a substantial differential from the complete 608-acres. Many of the individuals of the 13 species will be killed during construction operations, particularly the smaller, less mobile animals. Others will be forced into new territory. Of the larger animals, they will be forced to compete with others of their species in substantially less area.

So, the Project is not protecting sensitive natural resources except those that it is prohibited from completely destroying [largely, riparian wetlands]. Such practices of building urban density projects in rural and even agricultural areas will ultimately decimate the natural environment is this the goal of the County with this project?

LU-6.4 Sustainable Subdivision Design: *"Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and when appropriate, provide public amenities. [See applicable community plan for possible relevant policies.]"*

C2b-55

C2b-56



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C2b-55 The project is consistent with LU-6.1. The project site does not support any threatened or endangered species, or significant populations of sensitive species pursuant to Federal, State or County guidelines. As discussed in FEIR subchapters 2.5 and 3.1.4, sensitive on-site wetland areas will be preserved and disturbed wetlands will be restored and enhanced at ratios of 3:1. Mitigation for impacts to upland habitats, suitable for foraging value, will be located off-site in areas that better contribute significant resources to an integrated preserve system within the proposed PAMA contributing to the long-term sustainability of upland vegetation types including coastal sage scrub and chaparral. See also Appendix W.

C2b-56 The project is consistent with LU-6.4 in that the project has been planned to conserve open space and natural resources, protect agricultural operations (Please refer to response to comment C1e-60.) See also Appendix W to the FEIR. As discussed in FEIR subchapter 2.4, the project requires the implementation of mitigation measures to ensure both the safety of on-site residents from adjacent agricultural operations, as well preserve the integrity of those off-site operations from on-site land uses. Development in accordance with the Fire Protection Plan will ensure safety for residents. Please also refer to the Global Comment addressing Fire. In addition, the project is designed in accordance with LU-1.2, which addresses sustainable development practices, including impervious footprints, location and agriculture. Please see Global Comment addressing LU-1.2.

With respect to the project being planned to increase fire safety and defensibility, all proposed on-site roads, as well as Mountain Ridge Road from the project's southern boundary to Circle R Drive, have been designed in accordance to the County Consolidated Fire Code and DSFPD standards and would exceed the driveway minimum horizontal radius, fall within the 20 percent maximum allowable grade and meet or exceed the minimum paved width requirements. Specifics of the proposed roadway designs compared to the Consolidated Fire Code are detailed in the Road Standard Comparison Matrix., Appendix P of the Fire Protection Plan (FPP). In addition, a regional evacuation plan was developed by the Deer Springs Fires Safe Council and approved by CAL FIRE and the

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	<p>C2b-56 (cont.)</p> <p>DSFPD. This community emergency evacuation plan is a significant component of the Project's Evacuation Plan. (FEIR Appendix K Section V.) The Evacuation Plan determined that the location of the project, which is proximate to the approved regional evacuation plan's major evacuation routes, and the existing and planned roads in the area provide adequate multi-directional primary and secondary emergency evacuation routes. (FEIR Appendix K, Evacuation Plan, Section III.) All of these roads will be improved and developed to at least the standards consistent with the County Consolidated Fire Code. (Evacuation Plan, Section III; see the Road Standard Comparison Matrix., Appendix P of the FPP, and pp. 33-38 of the FPP; see also FEIR, subchapter 2.7.2.4.) A Wildland Fire Behavior Assessment or fire model was included in the FPP to provide four worst-case scenarios for wildland fires. As a result of the findings of the fire modeling, project design features were incorporated into the Project, including fuel modification zones, use of ignition resistant building materials, fire and building code requirements, provision of secondary emergency access roads and adequate water supply for fire hydrants. The FEIR found that with the adoption of mitigation measure M-HZ-1, impacts to wildland fires would be reduced to less than significant. (FEIR, subchapter 2.7.2.4, and FPP pp 17-21.) Subchapter 2.7.3.4 of the FEIR also identified the project's contribution to a potential cumulative impact would be less than cumulatively considerable with respect to wildland fire hazards based on the FPP, associated landscaping plans and implementation of mitigation measures related to FMZs.</p> <p>The comment is incorrect that the project lacks assurances that amenities, such as parks would be built. In the case of the public park, the project will dedicate a public park (P10) to the County and provide the amenities in accordance with the County's Park Lands Dedication Ordinance. Interim parks will be provided as described in the Specific Plan upon the recordation of a final map, and prior to the development of the permanent park. The project will be required to build infrastructure to serve the project when such facility is needed, such as sewer facilities. The project requires the implementation of each of the mitigation measures identified in the FEIR by either phase, building permit issuance or other applicable measurement that will ensure construction and provision of services commensurate with development impacts. However, with respect to schools, the</p>
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	<p>C2b-56 (cont.)</p> <p>project will be required to pay the appropriate fees at building permit issuance. As detailed in subchapter 3.1.5.2 of the FEIR, pursuant to state law, SB 50 fees are paid as mitigation for a project's impact to school facilities. These fees, collected school district help fund the acquisition of sites and construction of new school facilities.</p> <p>The commenter asserts that the project would imperil existing and adjacent agriculture. However, the project's objectives include the recognition of the existing rural atmosphere of the surrounding area through use of agriculture on-site and provision of transitional features to provide adequate buffering between types of residences and active agriculture. The project will include buffers that will allow for the continued operations of adjacent agriculture, and the project would also include agriculture throughout the project site, as well as HOA-maintained agricultural open space including groves of orchard trees.</p>
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Comment-INCONSISTENT: The Accretive Project instead proposes the minimum required open space, eliminates existing and imperils adjacent agricultural operations, and substantially worsens fire safety and defensibility, as shown by the Deer Springs Fire District comments. Instead of reducing impervious footprints, it proposes 1746 residential units etc., covering 504 of its 608 acres. Trumpeting "sustainable" development practices, it completely ignores the fundamental requirements of LEED ND to have a Smart Location and preserve Agriculture. The public amenities necessary to support their proposed city in the county, parks, schools, sewers, are all couched in "conceptual" terms, with built-in defaults to convert acres to still more additional residences. If, for example, the school or park sites (proposed without school and park amenities) are not accepted, the SP provides for their easy conversion to residential uses. This provision would have to be amended to allow this Project, and the DEIR would have to analyze the environmental effects countywide of such an amendment.

QUESTION: Would this project be allowed in any other part of the County?

LU-6.6 Integration of Natural Features into Project Design: "Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources."

Comment-INCONSISTENT

With the exception of the riparian woodlands/wetlands that must be set aside, the 4 million cubic yards of blasting and grading will obliterate any other natural features of the Project site. Once completed, the Project will resemble any urban center in the county, with little of the natural landscape remaining. Native vegetation habitats will be destroyed and mitigated off-site. Animal populations will be destroyed or shoved to the remaining riparian set-asides or off-site. Avoidance of sensitive environmental resources is minimal; destruction of this area's natural features and mitigation elsewhere are the preferred approaches for this project, obviously inconsistent with Bonsall's objectives.

QUESTION: Please explain how can this project be compatible with LU-6.6 with the destruction of and grading of 4 million cubic yards of soil?

LU-6.9 Development of Conformance with Topography: "Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent possible."

Comment-INCONSISTENT: Could the writers of the GP and the Board of Supervisors with their approval not make more clear that the destruction of the land proposed by this Project's over four million cubic yards of grading to destroy natural features is prohibited? The Project glorifies, not limits grading. The Project proposes to obliterate, not "not significantly alter," the dominant physical characteristics of the site. This provision would require amendment to approve this project. The DEIR would have to analyze the environmental effects countywide of such an amendment.

QUESTION: When will the County provide the amendment?

C2b-56
cont.

C2b-57

C2b-58



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C2b-57 The project is consistent with LU-6.6. The most recognizable and sensitive natural feature on the property are the drainages with their mature oak woodlands. As discussed in FEIR subchapter 2.5, these features will be preserved within permanent open space easements. See also Appendix W to the FEIR.

C2b-58 The project is consistent with LU-6.9 in that grading in all phases, including off-site improvements would comply with the Landform Grading Guidelines contained in the Specific Plan, which will include the blending and rounding of slopes, roadways, and pads to reflect the existing surrounding contours by undulating slopes, replicating the natural terrain. Runoff is directed to existing drainages through appropriate mechanisms as discussed in the FEIR, Chapter 3.0 and in Appendix U-1, 2, 3 relating to hydrology and storm water management to the maximum extent practicable. See also comment C1e-56 above

Grading for the project maintains the overall general contour of the property, requiring 2,300 cubic yards of grading per home (which would require a minor grading permit on an individual lot basis). This is consistent with projects of this size. 99.7 percent of all steep slopes are retained in open space and private roads are used that reduce grading by reducing the design speeds and overall development foot print, and following the contours of the property.

LETTER

RESPONSE

<p>BONSALL COMMUNITY SPONSOR GROUP <i>Dedicated to enhancing and preserving a rural lifestyle</i></p>  <p>CONSERVATION AND OPEN SPACE ELEMENT</p> <p>GOAL COS-2 Sustainability of the Natural Environment: <i>"Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development."</i></p> <p>COMMENT-INCONSISTENT: The Project will eliminate 504-acres of mixed native and agricultural lands that provide foraging area for numerous animal species identified in the biological resources report. This represents an incremental loss of habitat and ultimately a loss of local wildlife populations within the county and the Project site. The removal of the project site from the inventory of rural lands to create an urban village will constitute an irreversible loss and opposes the intent of sustainable development.</p> <p>QUESTION: Please state how this project with the above information will be consistent with Goal COS-2?</p> <p>QUESTION: There are so many inconsistent elements with this project the General Plan and the Community Plans that Bonsall could fill page after page with stated Goals and Policies that are being ignored and yet the DEIR states they are consistent please explain the logic?</p> <p>Community Plan Inconsistencies</p> <p>A. Community Character Goals</p> <p>Goal LU-1.1 A unique balance of Bonsall's rural agriculture, estate lots, ridgelines, equestrian uses, and open space land uses within the community, including open space and low density buffers that separate the community from adjacent cities and unincorporated community and new development that conserves natural resources and topography.</p> <p>Policy LU-1.1.1 Require development in the community to preserve the rural qualities of the area, minimize traffic congestion, and to not adversely affect the natural environment.</p> <p>Policy P LU-1.1.2 Maintain the existing rural lifestyle by continuing the existing pattern of residential, equestrian, and agricultural uses within the Bonsall CPA.</p> <p>Comment: The SP and DEIR cannot avoid the clear violation of these provisions by the fiction of merely adopting a new Map showing three Villages instead of two. The rural character of the project site, indeed all of the Planning Area, will be destroyed by plopping an urbanized area the size of Del Mar in the middle of an active agricultural area. Destruction of a designated Semi-Rural agricultural area cannot be interpreted to be "preservation." The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.</p> <p>QUESTION: Please describe the theory and process which led the County to think these Goals and Policy's are consistent with the project?</p>  <p>http://www.bcsgrg.org</p> 	<p>C2b-59 The project is consistent with COS-2. In keeping with the project objectives of a consolidated development footprint, the project preserves the on-site sensitive wetland habitat while developing less sensitive upland areas where no significant populations of native species are located. As detailed in the FEIR subchapter 2.5, mitigation measures are required to assure the conservation of upland habitat in off-site areas to compensate for the loss of resources on-site. The amount of required mitigation is consistent with County and Wildlife Agency ratios. Preserving this land off-site, in areas of greater sensitivity, allows the County to fulfill the goals of the draft North County MSCP. The areas identified for off-site preservation (NC MSCP PAMA) will ensure that the natural environment is preserved in an interconnected preserve system.</p> <p>C2b-60 Please refer to responses to comments C2b-52 through C2b-59, above.</p> <p>C2b-61 The project is consistent with the Community Character Goals of the Bonsall Community Plan. The project would support and complement the rural lifestyle in Bonsall via the Specific Plan, which supports the continuation of on-site agriculture throughout the project site including common open space areas and biological open space. Overall, the project would include trails, equestrian opportunities, retained agriculture, preserve sensitive habitat and define neighborhood with architecturally appealing concepts.</p> <p>As discussed in subchapter 3.2.3 of the FEIR, the project would include on-site biological open space, common open space, LBZ buffers, as well as Mitigation Measures M-AG-2, M-AG-3, and M-AG-4, which would ensure that urban/agriculture compatibility conflicts are less than significant. The project incorporates mitigation measures and project design features to assure the protection of agricultural operations. Specifically, on-site prime and statewide importance soils that would be converted to non-agricultural uses would be mitigated through the purchase of agricultural conservation easements at a 1:1 ratio. Additionally, 42.2 acres of agricultural buffers and agricultural open space are included as part of the project design, and ongoing agricultural cultivation would be allowed to continue in these areas.</p>
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LETTER

RESPONSE

	<p>C2b-61 (cont.)</p> <p>The FEIR adequately analyzes the potential effects the Project would have on nearby agricultural land and the potential for the project to make agriculture less viable from a financial and practical perspective. Subchapter 2.4.3.3 of the FEIR states, “The pressure, inconvenience, and increased costs of operating remaining farms in areas converting to other uses may render continued farming infeasible or, at least, heighten the attractiveness of selling other farms for development.” The analysis concludes that a potentially significant impact would occur due to the potential incompatibility, but concludes impacts would be fully mitigated by proposed mitigation measures. Please see Global Response: Agricultural Resources, Indirect Impacts for information responsive to this comment.</p> <p>The FEIR also analyzed the potential growth-inducing impacts and adequately acknowledged the project's potential growth-inducing effect on agricultural resources. The FEIR addresses the intensification of land uses on the project site that would result from project development and whether such intensification would encourage substantial economic or population growth, or the construction of additional housing in the surrounding area, either directly or indirectly. (FEIR, p. 1-45) The analysis further reports that the proposed project would amend the Valley Center and Bonsall Community Plan Land Use designations for the project site, which would result in an increase of allowable dwelling units from approximately 110 to 1,746. (FEIR, p. 1-46) This would result in a direct increase in population that would exceed the population allowed by both the General Plan and Community Plans. (FEIR, p. 1-46) As a result of this growth, the FEIR concludes that “the intensification of land uses on-site could encourage intensification in the immediate project vicinity. As more intense uses are developed on-site, existing adjacent less intense or vacant lands may be encouraged to intensify.” (FEIR, p. 1-46.) Thus, the FEIR acknowledges that the intensification of land uses on-site resulting from the change in designation from “Semi-Rural” to “Village,” which would result in an increase in allowable dwelling units from approximately 110 to 1,746 could encourage similar intensification and conversion of land uses in the immediate project vicinity, which could (FEIR, pp. 1-46 and 1-48) result in adverse physical environmental effects, including impacts to visual resources, air</p>
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LETTER

RESPONSE

	<p>C2b-61 (cont.)</p> <p>quality, biological resources, cultural resources, and noise (FEIR, p. 1-49) While not expressly listed, it is evident from the analysis that the referenced intensification of land uses in the immediate project vicinity potentially would impact current agricultural resources, as such uses potentially give way to residential uses. However, as the FEIR analysis properly concludes, such potential impacts are too speculative for evaluation at this time because the specific nature, design, and timing of future projects is unknown, and any potential impacts would be evaluated at the time the future projects are identified and processed. (FEIR, p. 1-49) Specific to agricultural resources, while growth in the surrounding areas may be encouraged due to the intensification of uses on the project site, it is speculative to assume that such future development would occur on (i.e., convert) Prime or Farmland of Statewide Importance, the two relevant soil classifications. (See County Guidelines, p. 40)</p> <p>Community character is discussed throughout FEIR subchapter 3.1.4. The community character of both Valley Center and Bonsall is acknowledged as rural communities with relevant goals within each community plan addressing interest in preserving the rural character of the planning areas. Specifically, the Community Character Goals is to preserve and enhance the rural character of Valley Center. The project proposes many different densities and architectural styles, integrated into a cohesive community through landscaping, trails, and a Town Center to provide community focus. The Design Guidelines and other provisions of the Specific Plan assure that monotony in design is avoided. The proposed project further assures consistency with relevant policies associated with this goal through the requirement for Site Plan review by the Design Review Board.</p>
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BONSALL COMMUNITY SPONSOR GROUP*Dedicated to enhancing and preserving a rural lifestyle***B. Land Use Goals RESIDENTIAL LAND USE**

Goal LU-3.1 Estate lot residential development that provides adequate housing opportunities for all residents, while maintaining and enhancing the existing rural atmosphere of the community.

Policy LU-3.1.1 Require residential development application documents to show residential building pads and envelopes on all Tentative Maps for public review, along with the Health Department layouts and grading plan.

Policy LU-3.1.2 Require subdivision design to minimize adverse impacts to community character or to the environment, and to mitigate any impacts from other constraints on the land that could not be avoided. Require mitigation actions to remain within the CPA.

Policy LU-3.1.3 Buffer residential areas from incompatible activities, which create heavy traffic, noise, dust, unsightly views, or from incompatibility with the surrounding environment.

Policy LU-3.1.4 For proposed major subdivisions, require open space easements that first are considered for agricultural or equestrian needs of the Bonsall Community.

Policy LU-3.1.5 Preserve ridgelines by siting buildings below ridges or set back with sufficient distance to minimize visual impacts. Encourage screening to visually shield all structures, including the use of vegetation, as well as appropriate and varied building materials.

Policy LU-3.1.6 Encourage the development of assisted living facilities within or adjacent to the Bonsall River Village, while maintaining a balance of assisted living and conventional residential units.

QUESTION: How does this project meet the Bonsall Land Use Goals?**C. Village Boundaries Map**

Comment: The SP and DEIR cannot avoid the clear violation of the existing Map, which shows two, not three villages in Bonsall on Highway 76, by the fiction of merely adopting a new Map showing three Villages instead of two in Bonsall addresses the resulting conflicts with numerous other GP and CP provisions.

QUESTION: The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy in your answers please explain?

D. Community Conservation And Protection

Issue LU-5.1 The following policies shall govern all discretionary permit applications involving residential development within the Bonsall CPA. The intent of these policies is to set a minimum baseline for residential projects within the CPA in terms of community character and visual impacts, and these policies. In many cases, requirements in addition to those set forward are necessary and applicable on a site-specific basis.

Each policy addresses a characteristic of slope or soil type which acts as a constraint to development. For each constraint that a particular project site contains, the project must offer a

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C2b-62 The project is consistent with the policies associated with Goal 3.1.

- Policy LU-3.1.1: The project will comply with all County submittal and review requirements for subdivisions, thus ensuring project Tentative Maps provide adequate information. All project maps will require County planning and engineering review, and mixed use areas are specially designated to ensure community review. Therefore the project is consistent with this policy.
- Policy LU-3.1.2: The project has included design measures or mitigation measures to minimize, where feasible, significant impacts to the community and the environment. See FEIR, Project Description and Table S-1. The project includes extensive onsite mitigation for impacts to sensitive habitat and agriculture. Project design guidelines for landscaping and architecture contain rural concepts. See Specific Plan, Sections II and III. Therefore the project is consistent with this policy.
- Policy LU-3.1.3: Between the landscape plan, the parks, the trails, and the juxtaposition of the biological open space and agricultural buffers, the project layout ensures adequate buffering between residential and non-residential uses. See FEIR, Figure 1-4a. Therefore the project is consistent with this policy.
- Policy LU-3.1.4: The project includes 20.8 acres on-site that would be available for community gardens and orchards, and offsite permanently protects 48.3 acres of prime farmland and farmland of state wide importance. The 16 plus mile of project trail network includes equestrian trails where they coincide with and connected to regional trails. Therefore the project is consistent with this policy.
- Policy 3.1.5: The project will not obstruct any ridgelines. Project facilities will be adequately landscaped as described in the Specific Plan. Project architectural guidelines require the use of varied building materials. Therefore the project is consistent with this policy.
- Policy LU-3.1.6: The project features an assisted living and senior care facility thus balancing the project conventional residential units. Therefore the project is consistent with this policy.

LETTER

RESPONSE

	<p>C2b-63 The project proposes to amend the Regional Land Use Element Map of the General Plan to change the existing Semi-Rural Regional Category to a Village Regional Category; amend the Valley Center Community Plan Map to change the existing land use designation from Semi-Rural SR-4 to Village Residential and Village Core (and revise the community plan text to include the project as a third village); amend the Bonsall Community Plan to change the existing land use designation from Semi-Rural to Village Residential land uses, (and revise the community plan text to include the project); and amend the Mobility Element to downgrade the segment of West Lilac Road from Running Creek Road to Main Street from a 2.2C to a 2.2F road. The FEIR provides an analysis of all potential impacts associated with those proposed changes,</p> <p>C2b-64 The project is consistent with policies contained in Bonsall Community Plan Goals LU-5.1 and LU-5.2: Please refer to FEIR Appendix W for a detailed account of the project's consistency with all relevant Community and General Plan Goals and Policies.</p>
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compensating benefit, designed to ameliorate the immediate impacts of the project and provide overall benefits to the community. These benefits are of two types; limitations on grading for residential building pads, and dedications of natural open space easements, agriculture or equestrian easements over certain areas on the site. Limitations on pad grading provide benefits in terms of visual impacts, reduced storm runoff and reduced removal of soil in rocky areas which are difficult to re-vegetate. Dedications of natural open space easements provide benefits in terms of fewer visual impacts, reduced storm runoff and a reduction in erosion caused by denuding of vegetation.

Goal LU-5.1 A physical environment where degraded riparian areas have been restored and the natural topography retained.

Policy LU-5.1.1 Consider restoration and rehabilitation of former or degraded riparian areas as a form of mitigation.

Policy LU-5.1.2 Require grading to be contoured to blend with natural topography, rather than consist of straight edges.

Policy LU-5.1.3 Minimize grading to preserve natural landforms, major rock outcroppings and areas of existing mature trees. Integrate hillside development with existing topography and landforms.

Policy LU-5.1.4 Restrict, to the maximum extent feasible, extensive grading for development projects in areas with slopes that are 20 percent or greater, in order to preserve and protect the environment, and to lessen grading and erosion.

Policy LU-5.1.5 Require development on slopes to be stepped to follow and preserve topography to the maximum extent feasible.

Policy LU-5.1.6 Minimize cut and fill grading for roads and access ways to the absolute minimum necessary.

Goal LU-5.2 The preservation of groundwater resources, community character and protection of sensitive resources in the Bonsall Community Planning Area.

Policy LU-5.2.1 Require lot sizes, except through planned development, lot area averaging or specific plan projects, to be no smaller than:

• 50 percent of the density indicated on the Land Use Map, without clustering or lot averaging, for Semi Rural 4 and higher densities, or

• Four acres for Semi Rural 10 and lower densities.

Implementation LU-5.2.1 Zoning Ordinance

Example: Semi Rural 2 establishes a density of one dwelling unit per two acres. Fifty percent of that density would result in a minimum lot size of one acre.

Policy LU-5.2.2 Allow further reductions in minimum lot sizes indicated in Policy LU-5.2.1, through Planned Development, Lot Area Averaging, or Specific Plan projects only when setbacks, building scale, and design are appropriate to retain the equestrian and agricultural community character in the area.

QUESTION: Please explain the justification in ignoring our community plan its Goals and Policies?

C2b-64
cont.



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The Conservation Subdivision Program (CSP) encourages residential subdivision design that improves preservation of sensitive environmental resources in a balance with planned densities and community character. The CSP allows for reductions in lot size through Lot Area Averaging and Planned Residential, with specific findings and discretionary review. More information on these requirements is available in the Zoning and Subdivision Ordinances.

E. Agricultural Goals

Agricultural land is a valuable resource in Bonsall as well as San Diego County in general. If this resource is depleted or adversely impacted, it will not be replaced elsewhere due to the unique microclimates that exist throughout the area. These microclimates offer greater humidity and more uniform temperatures than found further inland. Such climatic conditions also have produced a unique soil.

Agriculture is also important in maintaining the rural character of the community. Due to the relatively small area needed for certain crops, such as avocado, citrus, meyer lemons, and grapes, agriculture may effectively coexist with residential uses. This mix of land uses serves to preserve and enhance the rural character of the area by providing a vegetation buffer between houses. Bonsall's most important commercial agricultural and equestrian activity, in terms of gross income, is avocado farming. Smaller, but commercially significant investments include horse ranching, subtropical fruit, nursery and plants. The future of agricultural land uses will be based on important marketing factors, many of which are external to the CPA or the county as a whole. There are also approximately 492 acres in agricultural preserves, established by resolution of the Board of Supervisors, pursuant to the Williamson Act of 1965. Of the 492 acres in agricultural preserves, approximately 112 acres are under Land Conservation Contract, also pursuant to the Williamson Act.

Agricultural soils and production

Goal COS-1.2 The continuation of agriculture as a prominent use throughout the Bonsall community.

Policy COS-1.2.1 Encourage the protection of areas designated for agricultural activities from scattered and incompatible urban intrusions, along with the provision of greenbelt/buffers between agricultural zoning and urban zoning.

Policy COS-1.2.2 Encourage the use of agriculture easements in the CPA, especially as part of the Conservation Subdivision Program, while maintaining community character with rural and semi-rural homes.

Policy COS-1.2.3 Require development to minimize potential conflicts with adjacent agricultural operations, through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture and support local and state right-to-farm regulations.

C2b-65

C2b-66



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C2b-65 Please refer to response to comment C2b-64, above.

C2b-66 The project is consistent with the Agricultural Goals contained in the Bonsall Community Plan.

- Policy COS 1.2.1: The project provides buffering at all locations where the project site is adjacent to agricultural activities as means to reduce impacts associated with adjacency impacts. The buffering features include agricultural buffers, additional rows of crop trees, and fencing. Please refer to FEIR subchapter 2.4, with focus on Mitigation Measure M-AG-2, M-AG-3, and M-AG-4. Please also see, Global response: Indirect Agricultural Impacts for a detailed discussion of this issue.
- Policy COS 1.2.2.: The proposed Project would be consistent with Policy COS-1.2.2 as it includes mitigation that requires the applicant to purchase agricultural conservation easements to mitigate the significant impacts to Prime and Statewide Important soils that would result from Project implementation. (See Mitigation Measure M-AG-1.) The acquisition would be made either through the County's PACE program, or independently at a location within the cumulative project area or one approved by the County's Director of Planning and Development Services. On-site, the Project will include a 50-foot agricultural buffer along the perimeter of a substantial portion of the Project site that will be planted with two rows of either citrus or avocado trees. The buffer is required by Mitigation Measure M-AG-2 and would function much as an agricultural easement would to the extent it would ensure the continuation of agricultural uses within the designated areas. In addition, as detailed in Section III of the Specific Plan, existing agricultural uses in the Biological Open Space will be allowed to continue. (Project Description, p. 1-18.) Groves of orchard trees would be integrated throughout the Project site and would be located within HOA-maintained open space. A total of 20.3 acres of common area would be available for agriculture. (Project Description, p. 1-19.)

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Additionally, the proposed Project would maintain the existing rural and semi-rural community character. The conceptual landscape plan establishes a California foothills landscape theme that proposes the conservation and integration of the existing environment. (Project Description, p. 1-28.) Native trees and shrubs such as sycamores, oaks, madrone, currant and toyon would be planted along parkways. (Id.) The Specific Plan also requires the use of fruit trees, which are a rural agricultural characteristic that exemplifies this area. Natural materials, rural styled fencing, and grove-like plantings of trees would be utilized throughout the project to relate to and enhance the rural visual setting consistent with the Valley Center Design Guidelines. (Id.)

- Policy COS 1.2.3: The project provides buffering at all locations where the project site is adjacent to agricultural activities as means to reduce impacts associated with adjacency impacts. The buffering features include agricultural buffers, additional rows of crop trees, and fencing. Please refer to FEIR subchapter 2.4, with focus on Mitigation Measure M-AG-2, M-AG-3, and M-AG-4. Please also see, Global response: Indirect Agricultural Impacts for a detailed discussion of this issue.

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Domestic agriculture is perhaps the most important element of the Bonsall rural lifestyle. Thousands of acres are devoted to commercial agriculture in the CPA, only about ten percent of Bonsall families are involved in commercial farming as a primary source of economic support. There is a great demand in the Bonsall area for lots where families can raise kitchen gardens, keep pleasure horses, and raise animals for domestic use.

"Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure continuation of an important rural lifestyle in Valley Center. Prohibit residential development which would have an adverse impact on existing agricultural uses."

Comment: Neither the SP nor the DEIR addresses this major thrust of both the GP and CP to "support" Agriculture, not destroy it.

QUESTION: The DEIR must, but does not, please explain and analyze the environmental effects of this discrepancy.

F. Circulation and Mobility (CM)

2.1 INTEGRATED MOBILITY AND ACCESS

Goal CM-1.1 A circulation system which preserves the rural character of the community and provides a safe, balanced transportation system, which includes automobile, bicycle, equestrian and pedestrian users.

Policy CM-1.1.1 Reduce traffic volume on roads recognized as future "poor level of service" with methods such as, but not limited to, providing alternate routes and reducing density.

Policy CM-1.1.2 Require development that increases truck traffic to use Interstate 15, State Route 76 and East Vista Way (S13), whenever feasible.

Implementation CM-1.1.1 Review discretionary project review procedures and, if necessary, modify procedures to require projects proposing an increase in truck traffic to, as a condition of approval, be required to utilize roads that are determined suitable for the particular type of truck traffic to be generated.

Policy CM-1.1.3 Coordinate with Caltrans to design and construct State Route 76, East Vista Way (S13), and Interstate 15 to efficiently carry traffic through the Bonsall CPA. Design and construct interior roads, such as Camino del Rey, West Lilac, Gopher Canyon, and Olive Hill to carry primarily local traffic and remain rural to the degree consistent with safety requirements.

Policy CM-1.1.4 Prioritize the preservation and protection of sensitive habitats, such as wetlands, over road location, relocation, or realignment. Encourage all mitigation to be on-site and site-specific. Require mitigation within the Bonsall CPA where on-site and site-specific mitigation is not appropriate, whenever feasible.

Policy CM-1.1.5 Minimize direct access points onto Mobility Element roads to produce unimpeded traffic flow in commercial areas. Require new Commercial development to provide, where possible, indirect access through the use of existing road access points, loop, or frontage roads, common driveways or similar means.

Policy CM-1.1.6 Minimize the use of cul-de-sacs in the Bonsall CPA and require new subdivisions to provide local connectivity by providing linkages for long-term circulation improvement.

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C2b-67



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C2b-67 The project is consistent with the policies associated with the Mobility Goal contained in the Bonsall Community Plan.

- Policy CM 1.1.1: Table M-4 of the Mobility Element identifies the deficient roadways and describes the rationale for accepting deficient roadway segments. Mobility Element Policy 2.1 requires development projects to provide associated road improvements necessary to achieve a level of service of "D" or higher on all Mobility Element roads except for those where a failing level of service has been accepted by the County pursuant to the specified criteria. The project proposes to add roadway segments to Table M-4 because the adverse impacts of increasing capacity would not justify the increase in traffic capacity. The Traffic Section of the EIR describes the number of environmental impacts and impacts to community character that would result in such improvements. The applicable situations for accepting a road classification where a LOS E or F is forecast includes those instances when the adverse impacts of adding travel lanes do not justify the resulting benefit of increased traffic capacity. This would include the following relevant situations:

- When marginal deficiencies are characterized along a short segment of a road and classifying the road with a designation that would add travel lanes for the entire road would be excessive; or
- When adding travel lanes to a road would adversely impact environmental and cultural resources or in areas with steep slopes where widening roads would require massive grading, which would result in adverse environmental impacts and other degradation of the physical environment. Therefore, the project complies with this policy.
- Regional connectivity issues would apply when congestion on State freeways and highways causes regional travelers to use County roads, resulting in congestion on the County road network. Rather than widening County roads to accommodate this traffic, the deficiencies in the regional road network should be addressed.

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RESPONSE

	<ul style="list-style-type: none">• Policy CM 1.1.2: The project is east of and adjacent to I-15 and so project truck traffic, for example generated by commercial goods and services and waste hauling, will use I-15 as the primary route in and out of the project. Therefore the project is consistent with this policy.• Policy CM 1.1.3: West Lilac Road is designed to comply with County Mobility Element standards (with noted design exceptions) for public streets and with the Valley Center Community Right of Way Development Standards, which provides standards for public road improvements. In addition, Section II of the Specific Plan's Goals and Policies, provides that the project's local road network be interconnected, appropriately scaled, and adhere to the character of the community. The project would also make improvements to the intersection of Gopher Canyon Road and East Vista Way within the Bonsall Community. Therefore the project is consistent with this policy.• Policy CM 1.1.4: The project includes the preservation of onsite habitat within a dedicated 104.1 acre biological open space easement. Road crossings have been minimized to the extent feasible and fully mitigated for, resulting in no net loss of habitat value or function. Therefore the project is consistent with this policy.• Policy CM 1.1.5: The project would minimize access points onto Mobility Element roads. The project would include two connections to West Lilac Road along the northern portion of the project and a third connection further to the south. An internal road system will provide access to the commercial areas within the project site. The private roads will be open to the public, interconnected with other private roads within the project and improved consistent with the County's private road standards, with certain exceptions approved by the County. All private roads will be designed and built to accommodate accessibility for fire vehicles and will be connected to the County public road system. Therefore the project is consistent with this policy.• Policy CM 1.1.6: The Lilac Hills Ranch circulation network includes an interconnected network of private roads that provide multiple internal connections. Lilac Hills Ranch includes four connecting points to existing roads, ensuring that both local and surrounding residents have alternate routes. Therefore the project is consistent with this policy.
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