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(3) lack of ability to reduce VMT the potential for greater GHG emissions and traffic impacts – The Downtown Escondido SPA Alternate has far fewer VMT, GHG emissions, and traffic impacts may or may not be true, but by itself it is not sufficient rationale to exclude the Downtown Escondido SPA Alternate.

**The County of San Diego MUST INCLUDE IN THE DEIR A REASONABLE ALTERNATE – THE DOWNTOWN ESCONDIDO SPA AND EVALUATE THE ABILITY OF THE ALTERNATE TO SATISFY PROJECT OBJECTIVES.**

**QUESTION: How did the County exclude this as an alternative and where is the detailed evaluation?**

**COMMENT : - 4.1.8 Road Standard Design Exceptions – THE Bonsall Sponsor Group does not support or ACCEPT ANY OF THE ROAD EXCEPTIONS**

There are potential safety Hazard issues with all of these Exceptions. The County has not performed and shared with the Public any Hazard analyses on nine of the proposed Road Exceptions.

**QUESTION: Where are the analyses of nine of the proposed Road Exceptions?**

Single Exception – Exception # 7 Mountain Ridge Design Speed. The “analysis” consists of less than a page on page 11 of the Traffic Impact Study, and this analysis has many unsubstantiated assertions. The “hazard analysis of Exception #7 Mountain Ridge Design Speed is discussed below.

**COMMENT: Please provide all hazard analysis in detail per applicants requested exception.**

The Applicant asserts the following on page 11 of the Traffic Impact Study (TIS):

“ii. HAZARDS DUE TO AN EXISTING TRANSPORTATION DESIGN FEATURE  
Mountain Ridge Road is a residential serving road with several vertical curves and design speed as low as approximately 5 mph along certain sections. Since the road is not currently built to County private road standards, an assessment according to Section 4.6 of the County Guidelines was completed considering the following factors:

- 1) Design features/physical configurations of access roads may adversely affect the safe movement of all users along the roadway.

C2b-128  
Cont.

C2b-129

C2b-130



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C2b-129 Please refer to the traffic hazards discussion on Section 4.6 of the project’s Traffic Impact Study which proves a full analysis this issue for all proposed road modification requests.

C2b-130 The TIS includes an analysis of traffic hazards pursuant to Section 4.6 of the County’s Guidelines for Determining Significance – Transportation and Traffic. The Traffic Guidelines are used to analyze potential hazards related to an existing transportation design feature. See Appendix E and FEIR subchapter 2.3.2.3 for an analysis in compliance with Section 4.6. The comment restates information contained in the TIS, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue with respect to the FEIR, no further response is required. Additional responses to specific comments follow.

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2) The percentage or magnitude of increased traffic on the road due to the proposed project may affect the safety of the roadway.

3) The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in conflicts with other users or stationary object.

4) Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.

The following is a discussion of each of these four individual factors:

1) There are several vertical curves along Mountain Ridge Road, some of which have grades exceeding 20%. The design speed along certain sections is only about 5 mph as constructed. Therefore, due to the presence of these curves and the design speed below County Standards, it is concluded that the current road may adversely affect the movement of users.

2) The project is forecasted to increase the ADT on Mountain Ridge Road from the current 160 ADT to 1,190 ADT. While this is a high percentage increase, an ADT of 1,190 ADT is only about 2 cars per minute during peak periods, and this amount would not significantly contribute to any safety issues along the roadway.

3) The presence of several vertical curves was described in Item 1) above. There are no horizontal curves on the roadway, nor are there any slopes, walls, or barriers that could cause conflicts. Therefore, no issues are expected due to this item.

4) Table on the previous page shows County private road standards for various roadway types depending on the level of ADT served by the roadway. Two columns were added to the Table. The first is an indication of each of the measurable criteria for Mountain Ridge Road. As can be seen, Mountain Ridge Road meets the standards of a 751-2,500 ADT road in all cases except for the vertical design speed. Since Mountain Ridge Road currently has design features, namely several vertical curves, that may affect the movement of users (#1) and does not fully conform to County private road standards (#4), it is concluded that a potentially significant impact could occur in terms of roadway hazards. The improvements being made to the existing Mountain Ridge Road are to widen the paved width from 20 feet to 24 feet, as well as lengthening one of the vertical curves to increase the minimum design speed from 5 mph to 15 mph."

C2b-130  
Cont.



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Public Comments regarding this purported “Hazard analysis of Road Exception #7 – Mountain Ridge Design Speed

**THE APPLICANT AVOIDS DISCUSSION OF MEASURABLE METRICS IN THE PRIVATE ROAD STANDARDS AND USES “Section 4.6 of the County Guidelines” TO CONSTRUCT ARGUMENTS BASED ON GENERAL VAGUE OBJECTIVES, RATHER THAN MEASUREMENT AGAINST A STANDARD.**

**QUESTION/COMMENT: Provide a complete reference to “Section 4.6 of the County Guidelines” – there is no such section in County Private or Public Road Standards provide the reference to the Bonsall Sponsor Group.**

**QUESTION: Below are specific questions that the Bonsall Sponsor Group requests detail answers regarding the “Hazards Analysis”:**

“1) There are several vertical curves along Mountain Ridge Road, some of which have grades exceeding 20%. The design speed along certain sections is only about 5 mph as constructed. Therefore, due to the presence of these curves and the design speed below County Standards, **it is concluded that the current road may adversely affect the movement of users.**”

**QUESTION: When a structured quantitative analysis is performed, the more appropriate statement is: IS A SAFETY HAZARD. Please answer why an analysis of the multiple driveway/road intersections were not analyzed? Many of the driveways have blind intersections, and vehicles might be backing into the road in reverse. Please also comment with a quantitative analysis on safety of design at full Emergency Access traffic loading in an Evacuation Scenario with all Access gates open?**

“2) The project is forecasted to increase the ADT on Mountain Ridge Road from the current 160 ADT to 1,190 ADT. While this is a high percentage increase, an ADT of 1,190 ADT is only about 2 cars per minute during peak periods, and this amount would not significantly contribute to any safety issues along the roadway.”

As we have commented in DEIR Subchapter 2.3 Traffic, there is required substantiation from the County on why the build out Project traffic estimate on Mountain Ridge changed from 2260 ADT to 1190 ADT. The County has yet to explain where the 1070 ADT traffic load went to. The only conclusion supported by facts is that in reality, Project traffic loads are considerably higher than the as yet unsupported 1190 ADT.

The County has again not assessed Hazards at Emergency/Evacuation traffic loading.

C2b-130  
Cont.

C2b-131

C2b-132

C2b-131 The driveways around Mountain Ridge Road serve only a very small amount of traffic and, therefore, an analysis of these locations is not warranted based on County guidelines. CEQA does not require a quantitative analysis of very rare speculative occurrences such as the impact to a roadway of a full evacuation scenario. In this case, there would be no design safety issues under full evacuation scenario because the traffic would be moving very slowly.

C2b-132 The 1,190 ADT forecast is correct for Mountain Ridge Road. Only Phase 5 of the project will have access to Mountain Ridge Road; hence, the lower traffic projection on this roadway.



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**THERE ARE SIGNIFICANT HAZARDS WHEN QUANTITATIVE FACTORS ARE OBJECTIVELY ANALYZED**

“3) The presence of several vertical curves was described in Item 1) above. There are no horizontal curves on the roadway, nor are there any slopes, walls, or barriers that could cause conflicts. Therefore, no issues are expected due to this item.”

C2b-133

**When a structured quantitative analysis is performed, the more appropriate statement is: IS A SAFETY HAZARD.**

**QUESTION: Please answer why an analysis of the many driveway/road intersections obscured by trees and bushes were not analyzed?**

4) Table on the previous page shows County private road standards for various roadway types depending on the level of ADT served by the roadway. Two columns were added to the Table. The first is an indication of each of the measurable criteria for Mountain Ridge Road. As can be seen, Mountain Ridge Road meets the standards of a 751-2,500 ADT road in all cases except for the vertical design speed. Since Mountain Ridge Road currently has design features, namely several vertical curves, that may affect the movement of users (#1) and does not fully conform to County private road standards (#4), it is concluded that a potentially significant impact could occur in terms of roadway hazards. The improvements being made to the existing Mountain Ridge Road are to widen the paved width from 20 feet to 24 feet, as well as lengthening one of the vertical curves to increase the minimum design speed from 5mph to 15 mph.”

C2b-134

**We take issues with several statements made here. First of all, the County has not performed a Hazards Analysis against Private Road Standards consistently. This “table” does not analyze conformance with Sight Distance Lines at Intersection with Public Roads.**

**QUESTION: Please provide analysis to the Bonsall Sponsor Group.**

**Mountain Ridge Road as proposed does not meet Sight Distance Line requirements at the intersection with Circle R Drive Public Road.**

**QUESTION: Please provide analysis to the Bonsall Sponsor Group.**

C2b-135

Disclosure in Table 7.2 of the TIS is the fact that the Project proposes grading improvements on Parcels 129-300-31 and 129-300-36 to lengthen vertical curves. **Please provide evidence that there is adequate Project rights for construction of these improvements, including temporary encroachment permissions for construction that enable continued use of the road by Residents during construction.**

C2b-136

**QUESTION: The Bonsall Sponsor Group would like to have provided the appropriate analysis as it has not been met in this DEIR.**



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C2b-133 See response to comment C2b-131, 1bove.

C2b-134 and C2b-135

The Mountain Ridge Road/Circle R Drive intersection was analyzed and sight distance requirements would be met and verified during implementation of a future implementing Tentative Map for this area. The road modification proposed is intended to alleviate any hazards associated with the roads current design. The existing sight distance issue at Mountain Ridge Road and Circle R Drive has been resolved by means of vegetation clearing along Circle R Drive. As detailed in Chapter 1.0 of the FEIR a Clear Space easement would be required at this location to assure the ongoing adequacy of the sight distance. Refer also to Global Response: Easements (Covey Lane and Mountain Ridge Roads) for details on the sight distance analysis that was completed.

C2b-136 Please see the Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary Table, which describes the respective off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties.

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A REASONABLE AND UNBIASED EVALUATION FINDS THAT THERE IS A SIGNIFICANT HAZARD SHOULD ROAD EXEMPTION # 7 MOUNTAIN RIDGE REDUCED DESIGN SPEED RECEIVE APPROVAL. APPROVAL SHOULD BE DENIED FOR ALL ROAD STANDARD DESIGN EXCEPTIONS.

C2b-137

**COMMENT - 4.1.9 Mountain Ridge Fire Station Public Road Alternate –THE COUNTY SHOULD NOT CONSIDER THIS ALTERNATE FEASIBLE.**

The Deer Springs Fire Protection District (DSFPD) does not accept this location as a solution for Fire Service for the Project, and has stated so in its June 2014 Public meeting, which is recorded in the meeting minutes.

This Alternate is being proposed by the County to provide the logic for taking Right of Way Rights via County Condemnation proceedings from private citizens to enable the Project to construct an Access Road in compliance with Road Standards and also to provide Pipeline Access to the Lower Moosa sewer facility.

C2b-138

This Alternate does not meet the requirements of Board Policy J-33, since it proposes encroachment on three residential structures and does not meet other J-33 requirements.

ALTERNATE 4.9 MOUNTAIN RIDGE FIRE STATION PUBLIC ROAD ALTERNATE IS NOT FEASIBLE AND SHOULD BE ELIMINATED AS AN ALTERNATIVE TO THE PROJECT.

**GENERAL PLAN INCONSISTENCY**

**I. Introduction:**

In comments submitted over the last several years about Accretive Investment Group's Specific Plan/General Plan Amendment (SP/GPA), the Bonsall Sponsor Group, the Valley Center Planning Group and the Valley Center Design Review Board have repeatedly challenged the proponent's assertions that this proposal is consistent with the adopted County General Plan [GP], or with Bonsall Sponsor Group Community Plan, Valley Center's Community Plan [CP], or with Valley Center Design Guidelines.

C2b-139

Our previous comments, which are attached, have also challenged the Orwellian logic exhibited throughout the SP/GPA text, and the original Draft Environmental Impact Report (DEIR 2013) and now in the REVISED DEIR (DEIR 2014). We stand in robust opposition to the claims in these documents that a change of Regional Category -- from Semi Rural to Village -- magically reconciles the project's gaping inconsistencies with the intent of the Community Development Model and with the wide array of interdependent General and Community Plan Goals and Policies that are meant to implement it.

C2b-137 No traffic hazards would result from approval of any road design exception requests Please refer to FEIR subchapter 2.2.

C2b-138 The FEIR analyzed the fire response times for the project, including alternatives, as discussed in responses to comments C2b-41 and C2b-42. With respect to the assertion that the Mountain Ridge Alternative is being used to justify condemnation, there is no evidence presented by the commenter for this claim. The FEIR thoroughly analyzes project alternatives, as discussed in response to comment C2b-126. With respect to the concern raised by the commenter that DSFPD has not accepted the Fire Station in Phase 5 option, please refer to the Global Response: Fire and Medical Services.

C2b-139 Please refer to response to comment C2b-1 for a thorough discussion of project consistency with the General Plan and the Bonsall Community Plan. The project general plan amendment has been thoroughly analyzed under CEQA with respect to existing physical conditions, as discussed in response to comment C2b-2. See also, Global Response: General Plan Amendment CEQA Impacts Analysis.



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**QUESTION: Please provide the Bonsall Sponsor Group a clearly written document on how the change of Regional Category to Village is CONSISTENT WITH CEQA and not in opposition to the approved General Plan, the Community Development Model and the Community Plans of Bonsall and Valley Center?**

C2b-139  
Cont.

**QUESTION: Despite thousands of pages of "public comment" nothing has changed IN THE DEIR why?** The project parameters nor the perverse and circular arguments that, in the name of San Diego County, advance it. The proposed SP/GPA remains inconsistent -- broadly and fundamentally -- with the San Diego County General Plan and the Community Plans of both Valley Center and Bonsall.

C2b-140

**DEIR 2014 dodges rather than examines inconsistencies:**

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

**QUESTION: Where is the detailed analyses on all of the impacts please forward to the Bonsall Sponsor Group?**

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

C2b-141

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

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

**QUESTION: Where are the supportable conclusions?**

C2b-140 Please refer to response to comment C2b-1 for a thorough discussion of project consistency with the General Plan and the Bonsall Community Plan and the Valley Center Community Plan. The project general plan amendment has been thoroughly analyzed under CEQA with respect to existing physical conditions, as discussed in response to comment C2b-2. See also Global Response: General Plan Amendment CEQA Impacts Analysis for information relative to this issue.

C2b-141 and C2b-142

The project CEQA analysis is thorough and fully supported by 35 technical appendices, as further discussed in response to comment C2b-83.



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The double-talk of this DEIR is demonstrated in the mighty leap it takes from the truthful declaration (that this proposal is inconsistent with the existing General Plan) to the also truthful declaration (that the proposal *will be* consistent with the amended General Plan) -- without bothering to analyze the inconsistencies of the first condition. But analysis of the first condition is the entire point of an Environmental Impact Report.  
QUESTION: CEQA directs the County to answer the question: in what ways does this project change current conditions? How can planning professionals confuse the difference between pre-project and post-project conditions in the first place? And how can this "mistake" be repeated and elaborated in the revision despite hundreds of public comments that point this out?

The California Environmental Quality Act (CEQA) requires a General Plan consistency analysis and supportable conclusions. The conclusion of DEIR 2014 that planning impacts are 'insignificant' is not supported by the evidence.  
QUESTION: Please explain where is the consistency analysis?

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

But analysis of the first condition is the entire point of an Environmental Impact Report. CEQA directs the County to answer the question: in what ways does this project change current conditions? How can planning professionals confuse the difference between pre-project and post-project conditions in the first place? And how can this "mistake" be repeated and elaborated in the revision despite hundreds of public comments that point this out?

**Paramount among the project's GP inconsistencies is its failure to comply with Land Use Goal 1 (LU-1) and Policy LU1-2**

Consistency with Land Use Goal 1 (LU-1) and with Policy 1.2 (LU 1.2) is especially crucial for this project's approval. These speak directly to the requirements for establishing NEW villages in San Diego County. They emphasize the primacy of the Land Use Element and the Community Development Model, and the prohibition of Leapfrog Development.

**Land Use Goal 1: 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-142

C2b-143



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C2b-143 through C2b-153

This comment cluster, in general, questions project consistency with the General Plan Land Use Element Policy LU-1.2, specifically with LEED-ND equivalency principles. In general, the project is amending the General Plan by adding a new Village that meets the criteria of Policy LU-1.2. The project is not certified by the branded LEED-ND program commercially administered by the U.S. Green Building Council.

Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion of this topic including each of the concerns called out in this comment cluster. Please also refer to FEIR, Appendix W, for a thorough discussion of project consistency with LU-1.2.

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**Land Use Policy 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. For purposes of this policy, leapfrog development is defined as Village densities located away from established villages or outside established water and sewer service boundaries. (See applicable community plan for possible relevant policies.) **QUESTION: How does the County read this policy in relation to this project?**

C2b-143  
Cont.

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

As the 70 page booklet mentioned below makes clear: For LEED ND Certification location, conservation and design criteria are mandatory. This means that, regardless of how many "points" are accumulated for "green" amenities, LEED ND Certification cannot be achieved without meeting a few essential standards in particular categories.

We still await the County's analysis of the full complement of standards for LEED ND Certification.

**QUESTION: Please provide the Bonsall Sponsor Group with the analysis of the full complement of standards and the project meets all standards?**

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

C2b-144

C2b-144 Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion of how the project is LEED-equivalent.

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



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**SMART LOCATION and LINKAGE**

These are PRE-REQUISITE criteria. Compliance is mandatory.

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

**NEIGHBORHOOD PATTERN AND DESIGN**

These are PRE-REQUISITE criteria. Compliance is mandatory.

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

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

- 1) **The site is not a "Smart Location."** The EIR concludes that the project is consistent with LEED-ND but completely overlooks its mandatory site selection requirements. However, the EIR does not address how this aspect of LEED-ND can simply be overlooked when the program was specifically designed to "place emphasis" on site selection. A fundamental premise of Smart Growth is to lower automobile dependence as compared to average Development. The SANDAG average miles/trip for all of San Diego County is 5.8 miles/trip. The SANDAG average miles/trip for the unincorporated San Diego County is about 13 miles/trip which is why the region is directing growth to the incorporated cities and existing villages. Accretive is proposing an automobile based urban sprawl community that even with exceedingly high and unsubstantiated internal trip rates is 47% higher than the San Diego County average ( 8.52/5.8) trip distance.
- 2) **The site is too large (exceeds the 320-acre maximum size).** This maximum area is based on critical factors such as providing the appropriate density of services and neighborhoods within a compact community and achieving walkability. The EIR fails address how the project is still in compliance with the LEED-ND program when it exceeds a standard that was determined by the "core committee's research."

C2b-144  
Cont.

C2b-145

C2b-146

C2b-145 Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion of how the project is LEED-equivalent.

C2b-146 There is no minimum or maximum size for a LEED-ND project according to the, "LEED 2009 for Neighborhood Development Rating System," on page xiv, as published by the Congress for New Urbanism, Natural Resources Defense Council, and U.S. Green Building Council, who administers the LEED-ND. Nevertheless, as described thoroughly in Project Consistency with General Plan Policy LU-1.2, while the project is not seeking LEED-ND certification through the U.S. Green Building Council, equivalency with LEED-ND is not nullified, as the commenter asserts, by the fact that the project exceeds 320 acres.



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

C2b-147

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

C2b-148

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

C2b-149

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

C2b-150

7) **The site is not served by existing water infrastructure that is adequate to serve urban density.** Water infrastructure is designed for agricultural users and needs significant revision for high density Urban uses. There is no wastewater infrastructure

C2b-151

8) **No water or wastewater service is planned to serve urban development of this area.** Arguably the site is within a legally adopted, publicly owned water and wastewater service area. However, if "planned service" means that the current General Plan and the VCMWD's own plans currently call for expansion of the infrastructure required for a project such as this (which they do not), it does not meet this alternative, either. If it means only that a district with those powers exists and encompasses the Project site, then the Project must provide new water and wastewater infrastructure for the project. But it cannot do so because there are no easements the Project controls to establish such service.

C2b-152



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C2b-147 through C2b-149

The project is thoroughly walkable. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 (including analysis of LEED-ND equivalency) for a thorough discussion and analysis of project walkability (e.g., 16 plus miles of tree-lined, lighted, signed, soft base, paths and trails). See the Trail Plan in the Specific Plan, Figure 1-8. The Specific Plan, Section II (B) analyzes project walkability explaining that the project is zoned so that the geographic center is projected to be within one-half mile walk distance of at least seven diverse uses. Among the projected diverse uses are included: farmer's market, bank, coffee shop, bakery, drug store, senior care center, gym, recreational center, school, civic offices, public park, and commercial office

C2b-150 The project does not need to comply with LEED ND standards. It is considered an equivalent design. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for additional information regarding compliance.

C2b-151 As discussed in FEIR subchapter 3.1.7, the project is within the existing boundaries of the County Water Authority and the Valley Center Municipal Water District for water and wastewater services. It is therefore consistent with Policy LU-1.2 on that matter. Also as discussed in FEIR subchapter 3.1.7, the project will construct and install all facilities and lines that are required to serve the water and wastewater needs of the project. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 as to the project's consistency with equivalent LEED-ND design features relating to location within existing water and sewer district boundaries and for Recycling and Innovating Wastewater Technology.

C2b-152 Subchapter 3.1.7 of the FEIR and the Wastewater Alternative Study, (Appendix S), describes four alternatives routes for wastewater transmission lines to connect to the Moosa WRF. Each of these options follow improved existing roadways located entirely within public right of way or existing easements. Scenario 3 is the preferred route along the Mountain Ridge Road (Figure 3.1.8) easement. However, VCMWD has indicated, in a letter dated July 8, 2013, that it does not presently have sewer or recycled water easement rights across Covey Lane parcels or the West side of Mountain Ridge private road from the Lilac Hills Subdivision Boundary to the Circle R Public Road.

LETTER

RESPONSE

	<p>C2b-152 cont.</p> <p>In addition, VCMWD lacks sewer easement rights for approximately 1260 feet on the east side of Mountain Ridge private road. In order for the project to use three of these routes additional rights may need to be secured. As a result of the easements restrictions, a fourth alternative was examined. Subchapter 1.2.1.7 and 3.1.7.1 was revised after public review to describe the four possible wastewater scenarios. Therefore, in the event that it is found that additional right-of-way is needed for the installation of pipelines, the alternate route could be used. Locating the pipeline along a public road right of way is consistent with VCMWD Administrative Regulations Sec. 200.4 provides that under normal circumstances, sewer and water lines are to be located in a maintained roadway. However, VCMWD Administrative Regulations Sec. 200.3[d] provides that properties requiring an offsite line extension that do not have adequate easements to extend water lines may petition the VCMWD Board of Directors to initiate proceedings to acquire the easements through eminent domain. Ultimately it is in the discretion of the Board of Director's to decide whether to initiate proceedings to acquire the easements. California law also grants local public agencies the ability to impose conditions on private development requiring the construction of public improvements located within land not owned by the developer. (See Government Code Section 66462.5) Therefore none of the four scenarios are infeasible because of easement restrictions in that such rights may be legally obtained by the applicant.</p>
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9) Notably, the Project description itself demonstrates that the SP/GPA cannot satisfy ANY of the 3 OPTIONS for fulfilling the Smart Location REQUIREMENT:

- a. It is not an Infill Project
- b. It is not an Adjacent Site with Connectivity (does NOT have at least 90 intersections/square mile as measured within a 1/2-mile distance of a continuous segment of the project boundary, equal to or greater than 25% of the project) boundary, that is adjacent to previous development
- c. The site is not designed as a Transit Corridor or Route with Adequate Transit Service. The only mass transit is two bus routes located 4 miles north of the Project which run the circuit of the 4 Indian Casinos on SR- 76.
- d. None of the LEED ND significant public transit service requirements are met by the proposed circulation system. (e.g. at least 50% of dwelling units and nonresidential building entrances (inclusive of existing buildings) are within a 1/4 mile walk distance of bus and/or streetcar stops, or within a 1/2 mile walk distance of bus rapid transit stops, light or heavy rail stations, and/or ferry terminals, and the transit service at those stops in aggregate meets the minimums listed in Table 1).
- e. The only transit mentioned by Specific Plan and/or DEIR is that NCTD might consider a bus stop serving part of the project. This is inadequate.

C2b-153

C. Criteria 3: The Accretive SP/GPA fails to provide necessary services and facilities for the intense urbanization being proposed.

1. ROADS. Traffic impacts are significant.

- a. The applicant has proposed no acceptable mitigation measures. This SP/GPA will add 5000 urban residents to country roads while *reducing* road widths, *reducing* road design speeds and *ignoring other standards* established for safe, efficient transportation. The proposal:
  - Fails to provide necessary services and facilities
  - Is inconsistent with GP premises that development will pay for itself;
  - Is inconsistent with the GP minimum standard for LOS D on County roads;
  - Compromises the safety, comfort and quality of life of prospective residents as well as all the other residents of Valley Center who depend on these Mobility Element roads.

C2b-154



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C2b-153 Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

C2b-154 All roads in the vicinity of the project will operate at LOS D or better when the project is built out. See subchapter 2.3 of the FEIR, for the analysis of the project's impacts to roads, intersections and Caltrans' facilities and is based on the Traffic Impact Study, attached as Appendix E to the FEIR. A complete synopsis of the Significant Direct and Cumulative impacts related to the Project can be found in FEIR subchapter 2.3.S.1. Table 2.3-24 and Table 2.3-25 provide a mitigation summary for the direct and cumulative impacts, respectively, for the project.

The cost of improving Mobility Element roads is not passed on to the taxpayer. The project applicant will mitigate direct impacts through construction of improvements as noted in the FEIR, Chapter 1 and as required through mitigation measures in Chapter 2.3.. Cumulative impacts will be mitigated through the payment of TIF, which has been found to be adequate mitigation.

The comment raises concerns with respect to hazards associated with the roadway network. All of the exceptions being requested for the roadway improvements were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions could be granted by the County where capacity and safety are not unduly affected. (REIR, subchapter 2.3.2.3, page 2.3-34.) In addition, 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.

TIF fees established by the County for the Valley Center area Valley Center area are assessed on development projects to ensure that they pay their fair share to mitigate cumulative traffic impacts to the road network.

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

QUESTION: This may be a repeat of previous questions and comments but they are critical issues to have answers to for a clear understanding of how the County has viewed this project and come to its conclusions.

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

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

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

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

C2b-154  
Cont.



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

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

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

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

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

**QUESTION: (Why invest public funds in planning, we ask, if the next step is to invest more public funds in a "review" that ignores the plan?)**

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

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

C2b-154

C2b-155

C2b-155 With respect to village expansion and the County Community Development Model, please refer to the Global Response: Project Consistency with the General Plan Policy LU-1.2.



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- 2. The sprawling site creates some 8 miles of edge effects that will threaten surrounding agriculture, horticulture and animal husbandry that the GP Community Development Model protects by designating this area for Semi-Rural and Rural development. This sprawling shape also increases the likelihood that the proposed project will be growth inducing as previously mentioned. } C2b-156
- 3. With 1746 units and 90,000 SF of commercial on 608-acres, there is insufficient land available for "feathering" residential densities as the Community Development Model intends and describes. } C2b-157
- 4. The site requires 3 separate commercial nodes to support the "walk-able" claim. It is more than a stretch to characterize the project as a "walk-able Village" when it is, in fact three circles of dense housing. Two of them are at least a mile from what the Community Development Model would characterize as Village amenities. The LEED ND standard for "walking distance" is 1/2 mile, the GP also cites 1/2 mile (GP, p.3-8). } C2b-158
- 5. This is not the "walk-able" compact Village it pretends to be. The "Town Center" is more than one and a half miles from the 1/2 mile standard required by LEED ND and cited in the General Plan. } C2b-159
- 6. The proximity of Rural Lands to the project presents wildfire threats which the applicant's Fire Protection and Evacuation Plans recognize but fail to adequately mitigate. In addition to wildfire the Accretive project adds the additional hazards of Urban Multi Story Structure Fires and nearly two orders of magnitudes increased volume and complexity of Emergency Medical Services (EMS). The Accretive Fire Protection Plan barely mentions the Structures and EMS hazard potential, let alone any mitigation plans. The Deer Springs Fire Protection District (DSFPD) has gone on the record three times (6/12/2012, 3/5/2013 and August 7, 2013 stating that DSFPD has major issues with the Project as proposed. Accretive has glossed over these issues raised by a Public Safety agency and the County has allowed the Project to proceed in the General Plan Amendment process. } C2b-160

Once again this may be repeated but all of the issues need to be answered and are critical to our communities.

**QUESTION: Please address all six clearly as to how these issues are in compliance with the General Plan, the Community Plans, the Community Development Model and LEED ND?**

**Purpose of the General Plan.** Chapter 1 of the General Plan contains in its Introduction an Overview an array of directives that the applicant, the applicant's consultants and the DPS staff have ignored. } C2b-161



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C2b-156 through C2b-159

Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for information relevant to these issues.

C2b-160 Please refer to Global Response: Fire and Medical Services.

C2b-161 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.

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The statements that follow, and many others that appear on several hundred pages of the County General Plan, reflect what many citizens believe is a social contract between San Diego County government and the people. To overlook these declarations in the review of this project would be a gross violation of the public trust. Here are a few ...

*The General Plan must be referred to in its entirety, including separately bound portions (such as community plans). While the GP is internally consistent, some issues are addressed through multiple policies and some receive refined and more detailed direction in Community Plans (p. 1-4.)*

1. *Policies cannot be applied independently (p1-5).*
2. *If you are a SD County resident or property owner, the GP indicates the general types of uses that are permitted around your home and changes that may affect your neighborhood, and the policies the County will use to evaluate development applications that might affect you or your neighbors. The Plan also informs you regarding how the County plans to improve mobility infrastructure, continue to provide adequate parks, schools, police, fire, and other public services, protect valued open spaces and environmental resources, and ...*
3. *Future development decisions must be consistent with the Plan.*
4. *The essence of the Plan lies in its goals, policies, and implementation programs.*
5. *Policies provide guidance to assist the County as it makes decisions relating to each goal and indicates a commitment by the County to a particular course of action.*

C2b-161  
cont.

**QUESTION: With this guidance for language in the General Plan how has this project moved forward through the process as if it met all of the Goals and Policies of the GP and the Community Plans please explain.**

Submitted by:

Margarette Morgan, Chair  
Bonsall Sponsor Group



<http://www.bcsq.org>



Letter C2b  
(2013 attachment)

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August 17, 2013

TO: Mark Slovick, Planning Manager, Lilac Hills Ranch Project  
Department of Planning & Development Services  
County of San Diego

FROM: The Bonsall Community Sponsor Group

RE: Accretive Investment Group proposal DEIR –DEIR Public Comment to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA),PDS2012-3810-12-001 (SP)

**GENERAL PLAN CONSISTENCY ANALYSIS**

**Introduction:**

In comments submitted over the last year, the Bonsall Sponsor Group and the Bonsall Design Review Board have challenged the applicants assertions that this SP/GPA is consistent with the adopted County General Plan [GP], or with Bonsall’s Community Plan [CP], or with Bonsall Design Guidelines. Our previous comments, which are attached, have also challenged the logic exhibited throughout Accretive Investment Group’s Specific Plan and now in their Draft Environmental Impact Report: 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.

We believe the proposed SP/GPA is inconsistent with the County’s General Plan and the Community Plans of both Bonsall and Valley Center, as well as with a number of other adopted planning documents. Further, we think the DEIR fails to disclose these broad and fundamental inconsistencies and 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” (Chapter 3 Environmental Effects Found Not To Be Significant (p 3-65).

The California Environmental Quality Act (CEQA) requires a General Plan consistency analysis and supportable conclusions. How can the DEIR conclude that planning impacts are ‘insignificant’ without these analyses?

*This DEIR fails to perform the analyses required for decision makers, first, to understand the parameters of this proposal, and, second, to appreciate the nature and reach of its impacts. Why?*

Internal consistency of all County General Plans in California is required by California State Law. Therefore, in considering a Specific Plan, particularly one that requires amendments to an adopted General Plan, it is crucial to understand exactly where the Specific Plan is inconsistent with General Plan regional categories, land use designations and road classifications, principles, elements, goals and policies. *Why was this not done?*

A Specific Plan is an implementation vehicle. Approval requires consistency with CEQA; consistency as well with the web of interconnected and mutually-supporting elements of the County General Plan, and consistency with the array of implementation actions, strategies and procedures that are in place to achieve the goals and policies that the General Plan sets forth. *Inconsistency requires denial of the project OR adapting the General Plan to fit the Specific Plan – the tail wagging the dog. Broad and fundamental amendments to adopted General and Community plans would require county-wide environmental review when will this be done?*

C2b  
-162



C2b-162 Many comments throughout this letter are duplicative of other comment letters submitted. Where relevant, response to comments in other are referenced as responsive to the comments herein.

The FEIR discloses the project’s inconsistencies with applicable land use policies. Each subchapter of the FEIR contains a regulatory setting section where the most applicable plans and policies are identified. Relevant General Plan policies are included in the regulatory setting. Detailed responses to individual comments follow.

General Plan Amendments are allowed by state law in accordance with the procedures established by the Board of Supervisors.

Subchapter 3.1.4 of the FEIR explains that the proposed project includes a General Plan Amendment, which if approved, would result in the project being consistent with the General Plan. See Global Response: Project Consistency with General Plan Policy LU-1.2.

Subchapter 3.1.4.2 of the FEIR clearly states that the project proposes land uses and densities that are not currently consistent with the adopted land use designation of Semi-Rural SR 4 (Valley Center Community Plan Land Use Map) and Semi-Rural SR 10 (Bonsall Community Plan Land Use Map).

In order for the Project to be approved and implemented, the General Plan Regional Land Use Map needs to be amended to change the adopted regional category (Semi-Rural) designation of the project site and to re-designate the entire 608-acre site as “Village” (as shown in Figure 1-1 of the FEIR). In addition, the Valley Center Community Plan (VCCP) land use designation for the Project would need to be amended to Village Residential (VR 2.9) and Village Core (C-5) and the (Bonsall Community Plan)BCP land use designation will need to be amended to Village Residential (VR 2.9) (as shown in Figure 1-2). The General Plan Mobility Element amendment of the road classification of West Lilac Road is addressed in subchapter 1.6 of the FEIR. (See also subchapter 2.3, Traffic with respect to West Lilac Road and Road 3.)

LETTER

RESPONSE

	<p>C2b-162 (cont.)</p> <p>General Plan policy LU-1.2 permits the establishment of new villages that are designed to be consistent with the Community Development Model, provide necessary services and facilities, and meet the LEED-ND certification or an equivalent.</p> <p>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.</p> <p>The existing VCCP identifies two existing rural villages where urban levels of development are permitted and the BCP recognizes three areas with the Village Regional Category. However, this does not preclude the addition of a new village that meets the criteria set forth by the General Plan. The project proposes to modify the text of both community plans by adding Lilac Hills Ranch as an additional rural village and as an additional Village Regional Category area.</p> <p>As described above the project would be consistent with all applicable policies of the County General Plan and VCCP once the General Plan amendments are approved. The Specific Plan also addresses General Plan consistency in Chapter 5.</p>
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We all can understand why the applicants might want to avoid disclosing the array of GP and CP Goals and Policies that this project violates. But CEQA's purpose is not to gloss over or obscure inconsistencies in order to ease approval of this project. CEQA's purpose is disclosure.

Therefore, the DEIR for this SP/GPA must reckon specifically and individually with the General Plan Vision and Guiding Principles and the reflection of these in the Community Development Model, as well as with Goals and Policies across the GP's seven elements: Land Use, Mobility, Conservation and Open Space, Housing, Safety and Noise, as well as goals and policies of the Bonsall and Valley Center Community Plans.

Once inconsistencies are disclosed there are only three ways to resolve them: reject the project, re-design the project, *or re-build the County General Plan to suit these applicants. Is this the goal of this project?*

Inconsistencies with General and Community Plans, Design Guidelines and other ordinances and policies are NOT subordinate to this project's Specific Plan, as the Specific Plan asserts. Why was this statement circulated in the DEIR?

1. Why is there NO GENERAL PLAN AMENDMENT REPORT? Nowhere is there analysis of this project's consistency with GP Goals and Policies. *There are CLAIMS of GP "conformance" but no data to support them WHY? Where is the data to support claims of GP conformance?*

2. *Why does this proposal fail to meet the LEED Neighborhood Development (LEED-ND)PRE-REQUISITE location criteria? This will be mentioned several times in this document to be answered by staff.*

LEED ND cites as key smart growth strategies the building on previously constructed development sites or "infill" sites [surrounded or mostly surrounded by previously developed land]. When a smart growth site is selected, there is no additional loss of biological habitat or excessive land gouging. *For this Project, LEED ND was not respected nor observed why? Why was LEED ND neither observed nor respected as a selected "smart growth" site?*

Oddly, the County General Plan recognizes the importance of LEED ND criteria and cites them as part of its principles. But, the DEIR and the applicant has subverted them in this case. *What was the reason that the DEIR did not analyze the Project in terms of its consistency with LEED ND? Given that, this project is a "leapfrog development, it must be certified as consistent with LEED ND requirements or its equivalent? If using an equivalent standard for certification, what is the equivalent standard?*

3. Why is it that *Valley Center and Bonsall bear more than a fair share of San Diego County General Plan growth even before the addition of the proposed Lilac Hills Ranch project?*

a. The General Plan growth in housing units across the entire County of San Diego is summarized in Table X-Y below. Table X-Y San Diego County General Plan Housing Unit Forecast 2010-2050

C2b-162 cont.

C2b-163

C2b-164

C2b-165

C2b-166

C2b-166

C2b-163 The Specific Plan works in conjunction with the General Plan and associated community plans. Once adopted, the Specific Plan would serve as the document which provides development standards, similar to zoning standards, which would govern the design of the project. Any possible 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 standards that are contained in the Specific Plan.

C2b-164 General Plan Amendment Reports are not required by State law, nor does CEQA require such a report. Please refer to response to comment C2b-162.

C2b-165 The FEIR discusses the project's consistency with LEED-ND in FEIR Subchapter 3.1.4. Please also refer to Global Response: Project Consistency with General Plan Policy LU-1.2.

C2b-166 The conclusions of the County's 2011 General Plan related to locating growth are not applicable to the proposed project. Local housing trends are based on projected population growth which is used for planning purposes only.



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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.

C2b-166

This project has suggested changes to our Bonsall Community Plan that support a new town center designation in an area designated as agricultural in our community plan. We followed the goals of the General Plan by placing our density where sewer service and all of our current density planning is designated. *Why would the county approve a plan that does not support our established goals by placing a community center outside of our current community plan?* This project is a ‘COMMUNITY BUSTER’ and a ‘growth inducer’ that is not supported in the General Plan or the Community Plan why is this allowed?

C2b-167

Growth is also planned at the traditional town center, close to the intersection of SR-76 and Mission Road, where necessary infrastructure for dense, urban development is in either on the ground or planned (and funded) to be added shortly. This project has the ability to change the Bonsall Community Plan and create a second town center on our boundary with Valley Center where we have designated a buffer of large lots and agriculture. *Why should this project be allowed to change the Bonsall Community Plan with this designation? What about future landowners that can no long use their land for agriculture and sell to other developers that want to create more density and another town center? Why bother with a community plan if developers can subvert it to whatever they want with little regard to the communit?*

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

Table Y-Z: Bonsall and Valley Center Composite Housing Unit Analysis							
	Housing Units				% Growth from 2010		
	2010	2020	2030	2050	2010 to 2020	2020 to 2030	2010 to 2050
	Bonsall	3,875	4,320	5,149	6,151	11.5%	19.2%
Valley Center	6,638	7,627	9,795	13,411	14.9%	28.4%	102.0%
Subtotal General Plan	10,513	11,947	14,944	19,562	13.6%	25.1%	86.1%
Lilac Hills Ranch (LHR)		746	1,746	1,746			
Total with LHR included	10,513	12,693	16,690	21,308	20.7%	31.5%	102.7%
Reference: SD County growth	1,158,076	1,262,488	1,369,807	1,529,090	9.0%	8.5%	32.0%

C2b-168

C2b-167 The project will be served by the VCMWD for sewer and water services. Please refer to the FEIR subchapter 3.1.7 for a detailed discussion of public utilities proposed to serve the project.

SR 76, which serves the Bonsall Village, was accepted by the Board of Supervisors with a LOS E/F indicating much congestion. The proposed project is located 6 miles from the Bonsall Post Office, or Village Center, in an area where neighborhood serving uses do not exist. This project will provide such services as well as a community focus for the residents of that area.

There is no prohibition of a new Village in either the General Plan or the Bonsall Community Plan. If the project is approved, a description of a third village would be added to the Bonsall Community Plan. The effects of this potential impact are analyzed in the FEIR, Chapter 3.

C2b-168 Reference material is noted and included in the FEIR. No additional comment is required.



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The chart below is Bonsall's population growth/density without Lilac Hills Ranch.

CPA	Housing Units				Percent Change			
	2010	2020	2030	2050	2010-2020	2020-2030	2030-2050	2010-50
Alpine	6,535	6,690	7,875	9,157	2.4%	17.7%	16.3%	40.1%
Barona	202	170	170	170	-15.8%	0.0%	0.0%	-15.8%
<b>Bonsall</b>	<b>3,875</b>	<b>4,320</b>	<b>5,149</b>	<b>6,151</b>	<b>11.5%</b>	<b>19.2%</b>	<b>19.5%</b>	<b>58.7%</b>
Central Mountain	2,182	2,305	2,589	2,735	5.6%	12.3%	5.6%	25.3%
County Islands	614	607	607	635	-1.1%	0.0%	4.6%	3.4%
Crest-Dehesa	3,952	3,677	3,926	3,978	3.2%	6.8%	1.3%	11.7%
Desert	3,546	3,453	4,337	6,923	-2.6%	25.6%	59.6%	95.2%
Fallbrook	15,929	16,535	18,559	20,387	3.8%	12.2%	9.8%	28.0%
Jamul-Dulzura	3,234	3,372	4,398	5,263	4.3%	30.4%	19.7%	62.7%
Julian	1,711	1,748	1,884	2,015	2.2%	7.8%	7.0%	17.8%
Lakeside	27,575	28,517	30,339	30,915	3.4%	6.4%	1.9%	12.1%
Mountain Empire	3,023	3,056	3,903	5,108	1.1%	27.7%	30.9%	69.0%
North County Metro	16,114	19,548	24,090	25,946	21.3%	23.2%	7.7%	61.0%
North Mountain	1,527	1,759	2,002	2,388	15.2%	13.8%	19.3%	56.4%
Otay	7	490	2,035	2,158	6900.0%	315.3%	5.9%	30700.0%
Pala-Parma	1,980	2,285	3,037	4,399	15.4%	32.9%	44.8%	122.2%
Pendleton-De Luz	7,531	8,533	8,664	8,787	13.3%	1.6%	1.3%	16.8%
Rainbow	708	750	881	953	5.9%	17.5%	9.3%	36.0%
Ramona	12,376	12,692	14,107	15,140	2.6%	11.1%	7.3%	22.3%
San Diegoito	10,993	11,053	11,924	13,601	0.5%	7.9%	14.1%	23.7%
Spring Valley	20,533	20,939	21,837	21,852	2.0%	4.3%	0.5%	6.9%
Sweetwater	4,670	4,657	4,732	4,732	-0.3%	1.6%	0.0%	1.3%
Valle De Oro	15,543	15,648	16,022	15,968	0.7%	2.4%	-0.3%	2.7%
Valley Center	6,638	7,627	9,795	13,411	14.9%	28.4%	36.9%	102.0%
<b>Unincorporated Area</b>	<b>170,608</b>	<b>180,431</b>	<b>202,882</b>	<b>222,890</b>	<b>5.8%</b>	<b>12.4%</b>	<b>9.9%</b>	<b>30.6%</b>
San Diego County	1,158,076	1,262,488	1,369,807	1,529,090	9.0%	8.5%	11.6%	32.0%

SOURCE: SANDAG Profile Warehouse: 2050 Forecast

**FIRE PROTECTION PLAN (FPP)**

*Why doesn't the proposed Lilac Hills Ranch (LHR) Project FPP meet the following basic requirements identified below by Issue Number?*

1. Of the three Fire Station site Options proposed by the Applicant, none meet the minimum acceptance criteria of the Deer Springs Fire Protection District (DSFPD). The Charter of the DSFPD focuses on providing no greater than 5 minute emergency response time to the ENTIRE DSFPD, of which the proposed LHR Project is a subset. **WHY is this allowed?**
2. The Applicant states in the FPP that the LHR Project fully complies with the DSFPD Ordinance No. 2010-01, County of San Diego Consolidated Fire Code, and County of San Diego Public and Private Road Standards. **The LHR has factual compliance issues with all of these regulations. WHY is this allowed?**

C2b-169

C2b-170



C2b-169 See Global Response: Fire and Medical Services.

C2b-170 This commenter's assertion is incorrect. The FPP and FEIR evaluated the consistency of the proposed project with applicable fire protection regulations. The project demonstrates compliance with applicable fire regulations, including but not limited to the California Fire Code, California Code of Regulations, County Fire Code, or the County Consolidated Fire Code. The emergency road access (Fire Apparatus Access Roads) requirements for this project will be adequate and fire code compliant in terms of access and construction standards for roadways. Public roads serving the project will comply with the San Diego County Public Road Standards, West Lilac Road and a portion of Covey Lane, except for West Lilac Road in which six modifications or exceptions have been incorporated in the design. San Diego County Private Road Standards will apply to all interior roads. (Section 4.2 of the FPP provides that the circulation network shall be designed according to the County public and private road standards and in compliance with CFC Sec. 503.2.1 (see APPENDIX 'G' - Phasing Exhibit, Project Internal Circulation Map and Access Exhibit Map).

Gates proposed for the Project shall be in compliance with DSFPD guidelines and County Consolidated Fire Code, Section 503.6.

Water supply shall meet the water supply requirements of the San Diego County's Consolidated Fire Code and the Fire Code for a commercial/business/residential development. (FPP Section 4.3)

A Fuel Management Zone (FMZ) will be established within 100 feet of structures, to the extent possible, for each Implementing Tentative Map that is submitted to the County for approval pursuant to the County's Consolidated Fire Code and the California Fire Code. (FPP Section 4.4 and 4.5)

LETTER

RESPONSE

	<p>C2b-170 (cont.)</p> <p>The required (SDCCFC 2011) ignition-resistant construction for all structures will be required. The ignition-resistant construction requirements provide critical improvements to structures for minimizing ember penetration and resisting potential heat exposure. In addition, the FPP requires that ignition-resistant construction will apply to mitigate the ignitability of all future proposed structures and projections (casitas, storage sheds, exterior balconies, carports, decks, patio covers, unenclosed roofs and floors, etc.). (See FPP sections 4. 6, 4.7 and 4.8.)</p>
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- 3. The FPP focuses nearly exclusively on Wildfire Management and does not sufficiently address either Structure Fires or Emergency Medical Service (EMS) **WHY?** C2b-171
- 4. The FPP doesn't adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads **WHY?** C2b-172
- 5. Fuel Modification Zones (FMZ) – The applicant appears to rely on other property owners outside the LHR Subdivision boundaries to comply with the 100 foot FMZ requirement **WHY?** C2b-173

Each of the five Issues above is substantiated as follows.

Issue 1 – Acceptable siting Options for a Fire Station servicing the LHR Project - The following information has been synthesized from (documents provided by the Valley Center Planning Group in their submittal) the 6/12/13 (Attachment A), 3/5/2013 (Attachment B), and 8/7/2013 (Attachment C) DSFPD Letters. In addition, Valley Center Community Planning Group members had a 2 hour meeting with Chief Amestoy as well as telephone conversations with respect to Environmental Impacts of the proposed LHR Project. Information from these interchanges are reflected below and included in the Valley Center submittal. C2b-174

- The DSFPD Charter is to provide Fire and EMS services for the entire District, including the potential LHR Project.
- DSFPD owns three fire stations (Station 11- 8709 Circle R Drive, Escondido; Station 12 - at 1321 Deer Springs Road, San Marcos; and Station 13 - at 10308 Meadow Glen Way East, Escondido.

**HAZARDOUS MATERIALS AND WILD FIRES**

The present plan appears to ignore buffering of neighboring agricultural operations completely. This Project is replete with sensitive receptors such as schools, parks, homes, a church and a senior assisted living facility. Does the applicant anticipate that the County will impose buffer areas on the surrounding agricultural operations after approval of the Project? Have the surrounding agricultural operations been notified that their operations may be significantly impacted if buffering is imposed on them rather than the applicant? C2b-175

Policy S-11.5 seems to put the burden of buffering on the applicant, not the existing agricultural operations. **Will this be one of the General Plan policies that will be changed to accommodate the Project at the expense of established agriculture?** A reasonable analysis of the buffering requirement would conclude that buffering surrounding agricultural operations from the Project presents a significant impact to existing agriculture. The applicant's "Analysis of Project Impacts and Determination of Significance," [2.7.2] points to how significant this impact is:

**The project would result in a significant impact if it would:**

- 1. **Hazardous Substance Handling: Create a significant hazard to the public through the use of hazardous substances.**

While the applicant's intention was to discuss the applicant's proposed on-site handling of hazardous materials, that discussion should have also included the issue of buffering the application of pesticides, herbicides, fungicides, amendments and fertilizers by existing agricultural operations. **More than one operation adjacent to the Project uses helicopters to apply agricultural chemicals to broad swaths of orchards and fields. Overspray could be an issue if not properly buffered. How will the applicant address this CEQA mandatory finding of significance? Will the allowance of less than 100 ft buffer in the Bonsall area require existing agricultural to deal with the additional buffer impact????** C2b-176



C2b-171 As stated in response to comment 163 above, the FPP considered the property location, topography, geology, combustible vegetation (fuel types), climatic conditions, and fire history, water supply, access, structure ignitability, fire resistive building materials for residential structures, technical guidance for protection of commercial structures, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management. The FPP identifies and prioritizes the measures necessary to adequately reduce the fire risks of the project, including all structures.

The comment asserts that the FPP does not sufficiently address structure fires or emergency medical services such that the impact and mitigation can be assessed. The Fire Response Capabilities Assessment, prepared by Dudek and Hunt, dated May 24, 2014, ("Capabilities Assessment"), evaluated three separate response scenarios, including a structure fire, a wildland fire with structural threat, and a medical aid response. The response routes included one from each of the four existing stations providing service to DSFPD (Stations No. 11, 12, 13, and 15). (See Capabilities Assessment, attached as an Appendix to the Specific Plan, Section 2.3, page 50.) In addition, structure fires are included in analyzing the call load data and was included in the call volume and is a part of the evaluation. The data indicated that a very large volume of responses for DSFPD is for medical aid (37%), traffic collisions (11%), and cancelled calls (17%). Based on this data, and the information presented in the Capabilities Assessment, the FPP concluded that DSFPD would have the existing capacity to respond to all of these types of expected calls from the proposed Lilac Hills Ranch project (see FPP APPENDIX 'K' - 2005–2011 Response Data for Deer Springs Fire Protection District). (See also Section 4.1 of the FPP) Also, the project included design features for new development in WUI areas to minimize structural ignitions as well as providing adequate access by emergency responders. (See Section 1.1.2 of the Capabilities Assessment.)

LETTER

RESPONSE

	<p>C2b-172 The FPP requires that all gates are in compliance with DSFPD guidelines and County Consolidated Fire Code, Section 503.6. A gate across a fire access roadway shall be equipped with an approved design feature (i.e., electronic access) that provides access to the fire department and law enforcement. The project proposes to include gates that control public access to Phases 4 and 5, which will be developed as Senior housing. Private streets with gates are features of a number of major developments approved by the County of San Diego, including the Rancho Cielo, Castle Creek, Montecito Ranch, Woods Valley Ranch, and The Crosby Specific Plans, as documented in the Dudek (2013) Study. Any gate or barrier across a fire access roadway shall have specific plans reviewed and approved by Deer Springs Fire Protection District prior to installation. Additional information about gates is included in the FEIR, Chapter 2.7.</p> <p>C2b-173 The comment is incorrect. As stated in FEIR Subchapter 2.7.2.4, absent the availability of off-site clearing, where 100-foot FMZ cannot be met, the project includes a number of design considerations and mitigation measures detailed in the FPP (and FEIR Subchapter 2.7.2.4). The additional measures would assure that the same level of protection would be afforded to structures within the FMZ that have less than 100-foot buffer.</p> <p>C2b-174 Reference material is noted and included in the FEIR. No additional response is required.</p> <p>C2b-175 The proposed project implements 50-foot agricultural buffers with two rows of orchard trees in order to buffer the two uses and to minimize the effects mentioned in this comment. Specifically, the buffer is implemented where the project perimeter directly abuts adjacent off-site agricultural operation. Please refer to Figure 14 of the Agricultural Resources Report (Appendix H) of the FEIR.</p> <p>The second part of this comment is not applicable because, the project is implementing on-site compatibility buffers. Therefore, the burden rests with the applicant and not the surrounding agricultural operators, which would reduce potential impacts to less-than-significant.</p>
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LETTER

RESPONSE

	<p>C2b-176 Please refer to the preceding response. If approved, the project would not preclude aerial spraying or other chemical applications due to the buffering that would be implemented, provided that the applicable state and County regulations are adhered to. These regulations require prevention of “drift” onto neighboring properties and impose penalties should drift occur. As described above, the project design incorporates 50-foot buffers as well as land use restrictions where there are potential conflicts. See FEIR Appendix H, Section 3.2.3.</p>
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