LETTER	RESPONSE
Letter I33g **From:** Josette Franck [mailto:peechus_jf@yahoo.com] **Sent:** Friday, July 25, 2014 1:42 PM **To:** Slovick, Mark **Cc:** Blackson, Kristin **Subject:** Questions: LHR 2014 DEIR 3800 12-001 (GPA), et al Lilac Hills Ranch DEIR 2014 Mark Slovick, Project Manager (858)495-5172 Mark.Slovick@sdcounty.ca.gov Project: Lilac Hills Ranch Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 3600 12-003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 (MUP), 3500 12-017 (STP), 3500 12-018 (STP) Dear Mark, I have a slew of questions regarding the Lilac Hills Ranch 2014 DEIR. 1. How is the applicant funding the estimated annual $500k Deer Springs Fire Protection District budget shortfall for the Mountain Ridge Road fire station alternative? I33g-1 2. In which "Village" is LHR located in the recently approved, San Diego County General Plan (GP), and where in this current GP are the applicant's 1,746 EDUs planned? 3. How does LHR's 1,746 EDUs meet the current GP of allowing between 80-110 EDUs? I33g-2 4. Who within the County is the person responsible for verifying the applicant's purported easement rights? Once the limiting nature of the easements were discovered, what cause would the County have to enact overburdening of easements for the applicant? I33g-3 5. The Specific Plan Area (SPA) within the city of Escondido is near downtown Escondido, the Escondido Transit Center, and existing commercial & infrastructure, and can more easily accommodate Lilac Hills Ranch's planned structures and population. If a project like LHR I33g-4	I33g-1 The Specific Plan, Section IV Implementation includes a discussion of public financing options on page IV-10 which addresses financing for the proposed project. As the level of detail required in the analysis for a project alternative is not the same as for the project, specific funding plans associated with the Project Alternatives have not been developed. However, financing mechanisms similar to those identified in the Specific Plan would likely be required to fund the Mountain Ridge Road Fire Station Alternative. I33g-2 The project is not proposed within an existing Village in the General Plan. The project would result in a new Village in Valley Center through the processing of a General Plan Amendment. General Plans may be amended by Cities and Counties pursuant to Government Code Sections 65300 et seq. Chapter 3.0, subchapter 3.1.4, Land Use Planning of the FEIR and Appendix W provide information demonstrating how the project would comply with the General Plan. I33g-3 Please refer to the Global Response: Easements (Covey Lane and Mountain Ridge Roads) and Off-Site Improvements – Environmental Analysis and Easement Summary Table. I33g-4 The suggested Escondido alternative is outside the jurisdiction of the County of San Diego and is located nearly 15 miles away from the proposed project. This suggested alternative would therefore fail to meet a project objective of providing a range of diverse housing types with the jurisdiction of the County of San Diego to accommodate expected population growth and to assist the County in meeting the requirement to accommodate its fair share of housing for regional population growth as required by Government Code sections 65583 and 65584. Senior housing is a significant housing type in the proposed project. The 468 deed-restricted senior housing units in the development plan comprise 27 percent of the total number of housing units. None of the 171 development projects on the cumulative projects list (FEIR Table 1-6) appears to contain any deed-restricted senior housing units (or any other type of senior housing). The County's General Plan Housing Element Background Report (April 2013) identifies the housing needs of the growing elderly population to require special considerations such as proximity to services and shopping, as well as more affordability, all which can be achieved in the Village-style design of the proposed project.

LETTER	RESPONSE
	I33g-4 (cont.) The range of proposed housing types in the proposed project also includes single-family detached homes abutting open space. This housing type cannot be duplicated in a small-lot urbanized environment such as the Escondido Downtown Specific Plan Area (see Figure II-4, page II-12, of the Escondido Downtown Specific Plan, which figure is attached) that lacks any adjacent open space areas. Also, the applicant cannot reasonably, economically and timely acquire a large block of parcels under the Escondido alternative that are necessary to develop a comparable project that includes single-family detached homes and single-story senior housing. As shown in Figure II-4, page II-12, of the Escondido Downtown Specific Plan, the Escondido Downtown Specific Plan residential areas are comprised almost exclusively of very small legal parcels that are already developed. Those parcels are mostly in separate fee title ownership. The applicant would, therefore, be required to negotiate for and acquire hundreds of separate occupied and operational legal parcels from diverse ownership interests to assemble land for a comparable development project. Such tasks are unrealistic and infeasible. Please refer to the December 16, 2014 letter from project applicant regarding the Escondido Downtown Specific Plan submitted to the County. The alternatives evaluated in detail within the alternative subsection include: (1) No Project/No Development Alternative, (2) No Project/Existing Legal Lot Alternative, (3) General Plan Consistent Alternative, (4) Reduced Footprint Alternative, (5) Reduced Intensity Alternative, (6) 2.2 C Alternative, (7) Roadway Design Alternative, and (8) Mountain Ridge Road Fire Station Alternative. Each of these alternatives was selected in order to either: (1) avoid or minimize significant impacts associated with the project, or (2) compare potential effects with the General Plan Consistent alternative, which is considered a viable development option for planning purposes.

is to provide homes with commercial in a walkable environment, what would the County's valid reasoning be to NOT adopt this alternative? I33g-4 cont.

6. Is it 1,746 new EDUs, plus the existing 16 EDUs (1,762 total), or does the 1,746 include the existing EDUs? I33g-5

7. What commitment does the applicant have to build all 5 phases (bonded assurance, etc.)? I33g-6

8. How does the County justify tearing up West Lilac Road &/or Circle R Drive for wastewater / sewagefor LHR without requiring the applicant to widen these public roads? I33g-7

9. With respect to construction, emergency services, and current residents, when the currently working roads are torn up to install sewer / wastewater lines. What phase will this be started and completed? I33g-8

10. What other easements will the applicant require from abutting property owners to build LHR (slope, encroachment, etc.)? I33g-9

11. All traffic leaving & entering LHR should be included in project's cost, including turning the lengths of West Lilac Road & Circle R Drive into four-lane roads from where the project begins all the way to I-15, as well as Old Highway 395 (from Highway 76 on the north side to Country Club Lane on the south), and the full lengths of Old Castle & Lilac roads. Unless the project's traffic will travel telekenetically, it will be over these roadways. Where are these road widenings proposed in the 2014 DEIR? I33g-10

Thank you for answering all of the above concerns.

Respectfully,

Josette Franck
9767 Megan Terrace
Escondido, CA 92026
(760)509-5308

I33g-5 As described in Chapter 1.0, subchapter 1.2 of the FEIR, the existing residences are not included in the distribution of the project's 1,746 dwelling units described in the Specific Plan.

I33g-6 The Specific Plan, Section IV Implementation includes a Community Phasing Plan, starting on page IV-1. Construction of the project is anticipated to take up to 10 years. In response to market demands and to provide a logical and orderly expansion of roadways, public utilities, and infrastructure. As the project would be developed in phases, all commitments and requirements are tied to each phase of the project as conditions of approval of each Tentative Map or Tentative Parcel Map. For example, the applicant would be required to meet various commitments prior to approval of each Tentative Map or Tentative Parcel Map such as providing landscaping, street improvements, parks, open space dedications, and satisfying the mitigation measures included in the FEIR. However, there will be no condition that requires the applicant to construct all phases of the project.

I33g-7 The County can only require the applicant to widen roads where the those improvements are proportional to the impact caused by the project. The installation of water and sewer lines does not increase the demand on roadways which would require road improvements.

I33g-8 The first phase of the project that is implemented would require installation of sewer lines to serve the wastewater needs of the project. While the VCMWD would have oversight of the installation of wastewater facilities and sewer lines, it is expected that some sewer line infrastructure would be required with each phase of the project. As stated in the Specific Plan, development of the project could take up to 10 years.

I33g-9 The County is not aware of any additional easements required to construct the project, other than those identified in the FEIR.

I33g-10 The County can only require the applicant to widen roads where the those improvements are proportional to the impact caused by the project. Improvements to four lanes for the referenced roads are not warranted by the traffic analysis. Refer to subchapter 2.3 and Appendix E of the FEIR for details of the proposed improvements.