



LEAGUE OF WOMEN VOTERS OF SAN DIEGO COUNTY

July 28, 2014 Statement by the League of Women Voters of San Diego County
 To: San Diego County Department of Planning and Development Services
 Attention: Mark Slovick
 Re: Lilac Hills Ranch Draft Revised EIR (REIR)

Letter O5

The League of Women Voters has commented throughout the evolution of the General Plan, supporting principles of compact growth, enforcement of fire-safe development, and identifying and safeguarding valuable agricultural land, a limited resource. We promote conservation and preservation of critical natural resources. Our Land Use position supports minimizing urban sprawl and maintaining established patterns of growth and community identity by allowing self-determination in community planning and decision making. We review major development projects with regional impacts, including environmental analysis, for consistency with comprehensive and regional infrastructure plans. Land use decisions should relate to and protect the overall quality of the environment while minimizing additional motor vehicle traffic.

O5-1

Similarly, the County's General Plan incorporates smart growth and land planning principles intended to reduce vehicle miles traveled, thus reducing greenhouse gases, by locating future development within and near existing infrastructure. Whereas, the REIR traffic study indicates significant and unavoidable impacts on Interstate 15 from Riverside County to State Route 78.

O5-2

The Lilac Hills Ranch proposed mixed-use residential and commercial land uses, consisting of 1,746 dwelling units on 608 acres, are not consistent with the existing General Plan Land Use Designations of Semi-Rural and Rural Residential. This requires a General Plan Amendment and changes to the Valley Center and Bonsall Community Plans, which both Planning Groups voted against. This project also seeks to re-zone what is now predominantly agricultural land zoned as "Limited Agriculture" (A70) to Village Residential (VR 2.9) and Village Core (C-5). The REIR indicates that the site is a significant agricultural resource impacted by the significant loss of Important Farmland and 43.8 acres of soils of Prime or Statewide Importance.

O5-3

The General Plan prohibits leapfrog development, except for new LEED Neighborhood Development (ND) certified Villages. However, a LEED prerequisite stipulates development be sited in a *Smart Location* with existing infrastructure and nearby multimodal public transit, job availability and public services, thus, precluding this project, located 45 miles from San Diego.

O5-4

O5-5

The REIR shows significant and unavoidable adverse impacts to visual resources, air quality, and noise. The project site, located in a Wildland Urban Interface area in a moderate to very high Fire Hazard Severity Zone, would be susceptible to wildland fires with only three evacuation routes.

The County's revised conclusion is that this project could result in adverse physical environmental effects due to growth inducement, potentially further impacting visual resources, air quality, biological resources, cultural resources, and noise.

O5-6

The League of Women Voters of San Diego County believes that this project is not suitable for this location. We urge you to adhere to the principles and guidelines of the General Plan and deny the General Plan Amendment, re-zoning and the Community Plans changes. Thank you.

O5-7

Kay Ragan, President Cathrine Greene, Co-President Jósan Feathers, P.E., LEED AP
 LWV San Diego County LWV North County San Diego Natural Resources Director
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- O5-1 This comment is an introduction to comments that follow.
- O5-2 The comment restates information contained in the FEIR, 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.
- O5-3 The comment restates information contained in the FEIR, 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.
- O5-4 This comment states that the project does not meet General Plan Policy LU-1.2. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this matter.
- O5-5 The information presented in in the comment is consistent with the conclusions of the FEIR. Please refer to the following subchapters of the FEIR for detailed discussions related to each of the following CEQA-related issue areas: visual resources: subchapter 2.1; air quality: subchapter 2.2; noise: subchapter 2.8; fire/evacuation: subchapter 2.7.
- O5-6 The comment restates information contained in the FEIR, but does not raise an environmental issue within the meaning of CEQA. Please refer to the following subchapters of the FEIR for detailed discussions related to each of the following CEQA-related issue areas: growth: subchapter 1.8; visual resources, subchapter 2.1; air quality, subchapter 2.2; biological resources, subchapter 2.5; cultural resources: subchapter 2.6; and noise: subchapter 2.8.
- O5-7 Closing comment is acknowledged. 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.



LEAGUE OF WOMEN VOTERS OF SAN DIEGO COUNTY

2013 Letter

August 19, 2013 Statement by the League of Women Voters of San Diego County
To: San Diego County Department of Planning and Development Services
Attention: Mark Slovick
Re: Lilac Hills Ranch

The League of Women Voters has commented throughout the evolution of the General Plan, supporting principles of compact growth, enforcement of fire-safe development, and identifying and safeguarding valuable agricultural land, a limited but renewable resource. We promote conservation and preservation of critical natural resources, including habitat, open space and agricultural lands. Our Land Use position supports minimizing urban sprawl and maintaining established patterns of growth and community identity within an area by allowing self-determination in community planning and decision making. We review major development projects which have regional impacts, including environmental analysis, for consistency with the comprehensive plan and regional infrastructure plan. Land use decisions should relate to and protect the overall quality of the environment while minimizing additional motor vehicle traffic.

1

Lilac Hills Ranch proposes mixed-use residential and commercial land uses and densities consisting of 1,746 dwelling units on 608 acres that are not consistent with the existing General Plan Land Use Designations of Semi-Rural and Rural Residential. This requires a General Plan Amendment and changes to the Valley Center and Bonsall Community Plans, which both Planning Groups voted against, to allow Village Residential (VR 2.9) and Village Core (C-5) on what is now predominantly agricultural land zoned for some 157 homes as "Limited Agriculture" (A70). Both intermittent and ephemeral drainages occur within the project boundary. Although the General Plan prohibits leapfrog development like this, it does not apply to new Villages that are designed to meet the LEED Neighborhood Development certification. However, a LEED prerequisite stipulates that the development must be located in a Smart Location with existing infrastructure and near an existing community with multimodal public transit, job availability and public services. Other obstacles include environmental impacts associated with steep slopes requiring blasting and extensive grading, aesthetics, agricultural resources, air quality, global climate change emissions, transportation, noise, hazardous materials, wildfire hazards, biological resources, utilities, geologic hazards and erosion, and water quality during grading and construction of the project. Green developments respect the existing community fabric.

2

The League of Women Voters of San Diego County believes that this proposed project is not suitable for this location. We urge you to adhere to the principles and guidelines of the General Plan and deny the General Plan Amendment and Community Plans changes.

Thank you very much for your consideration.

Veronica J. Seay, President LWV San Diego County RoSeay@aol.com
Mary Crowley, President LWV North County San Diego
Jösan Feathers, P.E., LEED AP Natural Resources Director LWV San Diego County

1 Comment noted. 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.

2 The comment states that the project does not comply with General Plan policy LU-1.2. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this matter. The comment also restates information contained in the FEIR, but does not raise an environmental issue within the meaning of CEQA. Please refer to the following subchapters of the FEIR for detailed discussions related to each of the following CEQA related issue areas:

Steep slopes requiring blasting and extensive grading is addressed in FEIR subchapter 2.1 (visual) and 2.8 (noise); aesthetics including the project's compatibility with the existing visual environment is addressed in FEIR subchapter 2.1; agricultural resources including indirect impacts due to the project's location adjacent to agricultural operations is addressed in FEIR subchapter 2.4; air quality is addressed in FEIR subchapter 2.2; global climate change emissions is addressed in FEIR subchapter 3.1.2; transportation including impacts associated with increased traffic is addressed in FEIR subchapter 2.3; noise is addressed in FEIR subchapter 2.8; hazardous materials and wildfire hazards are addressed in FEIR subchapter 2.7; biological resources are addressed in FEIR subchapter 2.5; utilities are addressed in FEIR subchapter 3.1.7; geologic hazards is addressed in FEIR subchapter 3.1.1; and erosion and water quality are addressed in FEIR subchapter 3.1.3.