

Attachment D – Public Documentation

Attachment Page 67



County of San Diego, Planning & Development Services
**COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT RECOMMENDATION**
ZONING DIVISION

Record ID(s): PDS2012-3800-12-001 (GPA) 2012-3810-12-001

Project Name: Lilac Hills Ranch

Planning/Sponsor Group: Bonsall Sponsor Group

Results of Planning/Sponsor Group Review

Meeting Date: May 5, 2015

A. Comments made by the group on the proposed project.

"Motion: by Davis to deny the Lilac Hills Ranch Project in totality for all the reasons listed in the synopsis of the previously submitted packet attached to the minutes with special focus on Comments on the Proposed Lilac Hills Ranch General Plan Amendment and Specific Plan pages 1-7. Additionally it is felt that a large leapfrog project with that of the scope and scale proposed will further exacerbate the intolerable and unacceptable traffic conditions now being exhibited on roads serving the project, particularly the I-15". Second by Zales.

B. Advisory Vote: The Group **Did** **Did Not** make a formal recommendation, approval or denial on the project at this time.

If a formal recommendation was made, please check the appropriate box below:

MOTION: Approve without conditions
 Approve with recommended conditions
 Deny
 Continue

VOTE: 4 Yes 0 No Abstain 3 Vacant/Absent

C. Recommended conditions of approval:

Reported by: Margarette Morgan Position: Chair Date: 5/8/2015

Please email recommendations to BOTH EMAILS;

Project Manager listed in email (in this format): Firstname.Lastname@sdcounty.ca.gov and to CommunityGroups.LUEG@sdcounty.ca.gov

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COUNTY OF SAN DIEGO BONSALL COMMUNITY SPONSOR GROUP

REGULAR MEETING MINUTES

Tuesday, May 5, 2015

7:00 P.M.

31505 Old River Road

Bonsall, California

A. Roll Call:

PRESENT: Davis, Schwartz, Zales, Morgan

ABSENT: Norris, Carullo-Miller

Vacancy: Seat #2 South of 76 and East of Camino del Rey

B. Pledge of Allegiance:

C. Approval of Minutes of the March 3, 2015. Motion by Schwartz, 2nd by Zales minutes was approved.

D. Public Communication: None

Chair thanked J Harry Jones for the article on North County San Diego Development titled Boom or Doom more than 7,000 new homes have been proposed.

E. ACTION ITEMS: (Voting Items)

a. PDS2012-3800-12-001 (GPA) PDS 2012-3810-12-001 Lilac Hills Ranch

Member Richard Zales noted that numerous allegations were made about the activities of the Sponsor Group and presented a document titled Bonsall Community Sponsor Group (BCSG) Response to Allegations of Misconduct and Illegal Activity alleged during the regularly scheduled monthly meeting, on April 7, 2015 with the help of the chair **Allegation #1** by Mr. Goodson that chairwomen unfairly denied his request to proceed first and utilize a Power Point presentation. **Reponses:** Chair informed developer before the meeting via email that a the request for a Power Point presentation would not be possible as other presenters and project were not going to do to time concerns. **Allegation #2** Mr. Goodson named three members of the seven member panel as violating the Ralph.M.Brown Act. **Responses:** County Council and Staff found no evidence of a violation.



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Allegation #3 Mr. Goodson stated that the BCSG had discussed the motion outside of the meeting. **Response** - No oral or written discussion of a specific motion on the project by any member of the BCSG. The reference document that (is attached) was the distillation of previously submitted comments on the Lilac Hills Ranch to the County prepared by the chairwomen and sent to two other members for their information and comment. At the meeting, a hard copy of the previously submitted comments (since 2006) were given to each member to discuss at the meeting. The document was not a motion prepared but a list of questions. No written motion on the Lilac Hills Ranch project was prepared before, during or after the meeting on April 7th 2015. **Allegation #4** Mr. Goodson said that the BCSG did not “Not have authority to review” the project in relationship to the General Plan Amendment and the Specific Plan only the Board of Supervisors can vote on a General Plan. **Response** - County Staff made in clear in emails that the Planning and Sponsor Groups were given all of the Lilac Hills Ranch General Plan Amendment and Specific Plan documents for their review and comment. The April 11, 2015 email is a complete reference to Board Policy I-1. **Allegation # 5** According to Mr. Goodson a purported email from Mr. Mark Slovick, Project Manager, to the chairwomen of the BCSG, the BCSG review of the Lilac Hills Ranch project would be limited to “impact to the community, noise, etc.” **Response** – Staff comments from a CPRA was requested and the answer to the request for information of emails from Mark Slovick to and from Mr. Rilling and Mr. Goodson returned as an answer that no emails were sent or received by Mr. Slovick to Mr. Rilling or Mr. Goodson indicating any limitation on the authority of the BCSG. An email from the chairwoman of the BCSG to Mr. Goodson and Mr. Rilling requesting a copy of the alleged email has to date, not been answered. **Allegation #6** According to a statement by Mr. Goodson, the BCSG has not authority to discuss the Newland Sierra Project PDS2015-GPA 15-001, when considering the potential cumulative impact of the Lilac Hills Ranch project. **Response** – Newland Sierra project started their brief of the project in January 2014 and have presented information before the BCSG two time. County staff requested comments from the BCSG to address the Notice of Preparation for Newland Sierra.

After the presentation from Mr. Zales, chairwomen stated that the allegations were unfortunate and demeaning then opened the meeting to comments from the audience . Mr. Steven Lablonski a member of the audience made statements regarding his view of the project. Ms. Patsy Fritz brought up issues of the Ralph M. Brown and the presentation made by the developer and the allegations that were false. Mr. Skip Snyder said that the information put together was well done but last month the allegations did make us look bad. Why not a Power Point allegation #1 was reviewed again as Mr. Goodson was aware of why no Power Point was allowed and the reason they were not first. The purpose of Mr. Goodson’s allegations was to control the meeting and make the chairwomen and the group look bad and in opposition to the residents and guests.



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Ms. Jeanine Hass said that last month the BCSG was none responsive to all allegations why did the community not know about this project earlier. Chair the BCSG “has been dealing with this project since 2006. Ms. Hass why did we not review the color boards and marketing pieces we acted as if the material were not informative or part of the project.

Fritz- Valley Center did power point with errors and refused to supply copy. Only valid map is tentative tract map and it is inaccurate. Developer may apply for an assessment district and states that it is consistent with the General Plan. Chairwomen requested a copy of the Power Point that Lilac Hills wanted to present via email to preview and have on hand prior to the May meeting and thus meet the law of public information availability of all materials. James Gordon resident of Valley Center said that the Lilac Hills developers have made numerous representations without support of the truth. Fire response is not 5 but 10 minutes. Miller Fire Station is a seasonal fire station on plan not regular station. Sewer R-O-W needs eminent domain the project is a house of cards.

within the Response to Allegations packet found as a response to allegation #3 titled Proposed Lilac Hills Ranch General Plan Amendment and Specific Plan.

Chair opened the discussion regarding the - 7 page document titled

Bonsall Community Sponsor Group (BCSG)

Comments on the Proposed LILAC HILLS RANCH GENERAL PLAN

AMENDMENT AND SPECIFIC PLAN (PDS2015-3800-12-001 GPA; (PDS2012-3801-12-001SP)

The Bonsall Community Sponsor Group believes that this PROJECT IS NOT CONSISTENT WITH Guiding Principles and the Community Development Model.

The Project cites its consistency with the Guiding Principles and the Community Development Model in the General Plan for San Diego County. However, even a cursory examination of those principles and the model show that, rather than being consistent, the Project is conversely inconsistent with both the Guiding Principles and Community Development Model. The ‘community’ that needs to be addressed is the Valley Center community, and Bonsall the Project should be understood as an element of that community. The General Plan presently applies the Community Development Model to the Bonsall and Valley Center communities and the zoning and land use patterns within Bonsall and Valley Center are consistent with that model. The proposed addition of the LHR Project in the western portion of the Valley Center community and the east portion of the Bonsall community flouts the intention of the Community Development Model by establishing high-density development away from the community center, away from needed infrastructure, and in a designated agricultural area. The Project is leapfrog development and it does not qualify as a LEED-ND community under any reasonable interpretation of those standards.



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Phasing – The Applicant seeks the utmost in flexibility in developing the Project in Phases of which there are many possible permutations, and no assurance whatsoever of Project performance of Conditions of Development.

The County has endorsed this approach without any assurance of performance by the Applicant, such as bonded indemnification to ensure specific performance.

The Applicant states in the Specific Plan and the County states in the RDEIR that some Phases may never be built. This is of a major concern as the soil for grading for Phase I is located in Phase III of the studies. Mitigations for Traffic Impacts are tied to events that may never happen.

This is a serious defect with the RDEIR. There is no assurance that promised Mitigation will ever occur.

Phase 1 is a residential phase consisting of 121.5 acres located immediately south of West Lilac Road. This Phase is in Bonsall and provides a maximum of 352 single family detached homes, six parks (1.29 net acres). This phase does not have stores or any other commercial and will require all residents to drive out side of the area for services. Based on the County of San Diego formula each residential unit has 10 trips a day which would amount to 3,520 trips a day per household however if using the SANDAG model it is 12 trips a day or 4,224 trips a day per household on West Lilac Road.

Refer to the following Table 1 – 4 from Chapter 1 EIR Objectives page 1- 34.

**TABLE 1-24
GRADING QUANTITIES BY PHASE (cy)**

Phase	Cut	Fill	Net
1	715,000	860,000	(145,000)
2	635,000	830,000	(195,000)
3	1,815,000	1,260,000	555,000
4	295,000	420,000	(125,000)
5	610,000	700,000	(90,000)
TOTAL	4,070,000	4,070,000	-



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The Project represents that it requires no import or export of soil for all Phases in total. The Project requests any possible Phase implementation sequence. It is clear that Phase 3 is the source of fill dirt for all of the other four Phases and is required to be at least partially graded concurrently with the first and any other Phase. Please identify how the Project intends to implement Phase 1 without grading on Phase 3. Also, will Phase 3 be used as a quarry for fill dirt for an extended period?

The County of San Diego is deficient for not recognizing this most basic disconnect. The net result of this is a Significant Impact of Project Feasibility.

This example of infeasibility or vastly different Environmental Impacts is repeated over and over again with every Infrastructure aspect: Roads, Sewers, Waste Water, etc.

The timing of implementation of Mitigation is also required to be defined with much more rigor than the County has employed. Road Improvement from Significant Impacts are 'triggered' by attainment of a threshold number of Residential Units. The County of San Diego should recognize that certain Commercial Land Uses are far greater drivers of Traffic Impacts than Residential.

Another related defect of this "Phase Game" is that the sum of the Traffic related analyses, for example, have analyzed fewer than 50% of the possible permutations of Phase execution that the County has endorsed in this EIR.

Left with the unbounded Phasing strategy the Applicant proposes, the Project as implemented will have vastly different Environmental Impacts than those analyzed in this EIR.

The Project needs to be required to adopt a defined Phasing Plan sequence with only a few allowable Phase Alternates in order that the proper Environmental Impacts can be assessed.

The proposed SP/GPA is inconsistent in broad and fundamental ways with the San Diego County General Plan and Community Plans of both Bonsall and Valley Center. Further, the RDEIR fails to disclose and analyze these broad and fundamental inconsistencies and their environmental consequences as CEQA requires. The RDEIR is derelict in concluding as it does that: "The proposed project includes a General Plan Amendment, which if approved, would result in the project being consistent with the General Plan" (Chapter 3 Environmental Effects Found Not To Be Significant, p. 3-87). An Amendment to the General Plan should not mitigate the serious environmental impacts of this Project.



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The RDEIR failed 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. The RDEIR has only a rudimentary matrix of so-called Consistency with the General Plan in appendix W. However, the serious and unbiased analysis of consistency with the General Plan and the Community Plans has not been produced.

Internal consistency is required of all County General Plans 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.

Specific Plan is an implementation vehicle. Approval requires compliance 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.

Changes of this magnitude (Land Use Policies, Mobility and Safety Elements) to the August 3, 2011 San Diego County General Plan would require revisiting the Environmental Impact of the San Diego County General Plan and likely invalidates the San Diego County General Plan EIR. Broad and fundamental amendments to adopted General and Community plans would require countywide environmental review.

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 RDEIR 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.

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.



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The full text of the General Plan and Community Plan Inconsistencies comments does an exhaustive analysis of several of the General Plan and Community Plan goals and policies to reveal the inadequacies of the proposed Project and the premise being advanced to allow its approval.

GRADING

The grading, by cut and fill techniques, of 4-million cubic yards of earth will jeopardize the opportunity for future study and appreciation of the basic integrity of the cultural significance of the larger area. There are suggestions in previous studies that an as yet undiscovered earlier human habitation of the Project site area, or a separate village from those already known may be present.

STUDIES

There are also concerns about the data recovery program and its methodology. Most of the previous studies of the area are 35 years old and more current studies may be needed to fully understand the significance of the site.

DENSITY

The development of the densely packed Project adjacent to agricultural areas presents the need to buffer which is included in the Bonsall Sponsor Group Community Plan those agricultural areas from the development and its sensitive receptors [schools, churches, senior centers, parks, homes]. However, there is no discussion in this subchapter of General Plan policy S-11.5, which requires development adjacent to agricultural operations in Semi-rural and Rural lands to adequately buffer agricultural areas and ensure compliance with relevant safety and codes where hazardous materials are used. The RDEIR instead chooses to address buffers against hazardous materials in the 2.4 Agricultural Resources subchapter. Perhaps it seems like more of an agricultural problem in that context than a problem caused by poorly placing an urban development in an agricultural context.

WASTEWATER

The proposed wastewater recycling facility [WRF], if built will be using hazardous materials, such as chlorine, in its treatment process. The facility is only 686-feet from the proposed school site and only 250-feet from homes. Considering that there was a recent accidental spill of hazardous materials from a similar facility in Escondido, the conclusion that the risks from the use of toxic, hazardous materials are less than significant is overly optimistic, even under carefully controlled circumstances.



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The WRF will not be built to coincide with the earlier phases of the Project, requiring that sewage be trucked off-site for disposal. The same trucking issue will continue after construction is complete and the WRF is operational, in order to dispose of waste solids screened from the influent. What impact would the 2-3 times weekly truckloads of sewage and/or waste solids have on the safety of residents in the Project? Other potential issues are accidental sewage or sludge spills, not to mention the impact those frequent truck trips have on the traffic flow to and from the Project.

Specific Plan

The comments on the Specific Plan include several major concerns:

1. The Lilac Hills Ranch Project [the Project] is too large and too dense for Valley Center and Bonsall and it is improperly located. Urban densities are incompatible with the rural, agricultural location in which the Project has been sited.
2. Roads and Traffic. The road standard modifications proposed by the Project will downgrade the classification of a mobility element road [West Lilac Road] and will lower the design speeds of several road segments, both public and private. At the same time the Project will add over 5000 people and approximately 20,000 average daily trips to those narrower, slower roads causing congestion and road failure. Several Mobility Element Road segments associated with the Project will be allowed to sink to LOS E/F without mitigation because there wouldn't be commensurate benefit realized by adding lanes.
3. Compliance with the General Plan. The Project's Specific Plan threatens to overturn virtually every element in the County's new General Plan adopted in 2011 after 12 years of discussion, compromise and community involvement, over \$18 million in government expenditures and countless hours of effort on the part of local citizens. Approval of this Project will require damaging amendments to the General Plan and the Valley Center and Bonsall Community Plans that will be growth inducing, particularly in the western portion of Valley Center. If this Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the principles and policies of the General Plan and Community Plans. In the context of this Project, it is unclear that the General Plan is anything more than a placeholder until the next change is proposed.



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4. **The Project is seeking to build a city the size of Del Mar, CA that will require an almost entirely new infrastructure—new roads, schools, sewer systems and a broad range of other infrastructure items.** These infrastructure expansions are why the Valley Center Community Plan designates the North and South villages at the core of Valley Center for such housing and commercial densities. The Community Development Model also directs that kind of concentration of density and infrastructure not at the outer edge of the community as this Project proposes, but at the Valley Center core.

6...**LEED-ND/Sustainable and Walkable Community. This Project still has not meaningfully addressed the requirements for LEED-ND development, although it continues to be described as “designed to meet the standards of the LEED-ND or an equivalent program.” There is no equivalent program cited and the Project fails to meet any of the site location and linkage requirements listed in the LEED-ND pre-requisites and standards.**

PROPOSED SCHOOL FOR PROJECT

The proposed school is located in Phase III they are only asking for the build out of Phase 1 right now and is not in the Bonsall School District. If the project is approved that means that all homes within the project having children will need to drive their children to Valley Center High School and Bonsall Middle School as well as Bonsall Elementary School which would increase the traffic on West Lilac by a minimum of 704 new car trips a day for the children to be dropped off at the schools. In order to have the Bonsall School District have a school in the area within the project they would need to request an annexation from LAFCO that costs thousands of dollars and hope that Valley Center would agree.

TRAFFIC GREENHOUSE GAS EMISSIONS

Because of its location far from existing communities, job centers, and transit infrastructure, the Project will cause long single-occupant automobile trips that increase VMT, resulting in harmful GHG emissions. The EIR should analyze mitigation measures and alternative site location for such a large project.



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PROJECTS INABILITY TO ACQUIRE LEGAL RIGHT-OF-WAY

There needs to be a frank and succinct discussion of the Project's lack of legal right-of-way [ROW] for roads, sewer, and recycled water. The discussion needs to make clear to decision-makers how offsite improvements required for this Project will be acquired. There are 30 or more ROW acquisitions that the Project requires. The Project has made little progress in four years on acquiring required ROW. It is highly likely that the use of eminent domain for a minimum of thirty and likely a greater number of separate takings of unwilling property owners' land or interests in road and utility easements will be required to make this project feasible.

The County of San Diego has received hundreds of pages of factual information from multiple attorneys that demonstrate the absence of many legal rights for the Project's intended use of private roads and ROW for sewer and recycled water utility pipelines.

The County has taken the position that private road ROW disputes are between individual private parties. However, the County of San Diego has certain knowledge that offsite road improvements for the Project will require the County's use of eminent domain to acquire ROW for the Project.

The County needs to disclose information for the Project and each of its access alternatives so that impacts are identified and required mitigation can be implemented.

There are a few proposed scenarios for the improvement of West Lilac Road in relation to the Project. These include widening and straightening the travel lanes, adding features at the road edge and adding roundabouts. To accomplish these improvements will require the taking of private land by eminent domain. The County should disclose the precise impacts of the various alternatives and the possible mitigation options. Additionally, a rationale for considering alternatives [such as 2.2E or F] to the existing mobility element plan for upgrading West Lilac to a 2.2C standard should be shared.

End of 7 page document:



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Continuation of minutes from Page 3

within the Response to Allegations packet found as a response to allegation #3 titled Proposed Lilac Hills Ranch General Plan Amendment and Specific Plan. The document was reviewed and several topics discussed. This was the document that was presented at last month's meeting for the formation of a motion. Page 2 of 7 was closely reviewed - Development moves thousands of yards of dirt from Phase 3 to all other Phases looking at the chart that was supplied by the developer. This project was defined as Leapfrog development- and is not LEED-ND compliant as stated in the original documents. Vice-Chair Davis discussed the fact that the General Plan supports Smart Growth but this project is not smart growth and does not support the Policies or Goals of the General Plan or the Bonsall Community Plan. Impact on I-15 is over whelming.

“Motion: by Davis to deny the Lilac Hills Ranch Project in totality for all the reasons listed in the synopsis of the previously submitted packet with special focus on Comments on the Proposed Lilac Hills Ranch General Plan Amendment and Specific Plan pages 1-7. Additionally it is felt that a large leapfrog project with that of the scope and scale proposed will further exacerbate the intolerable and unacceptable traffic conditions now being exhibited on roads serving the project, particularly the I-15”. Public comment was offered by the chair prior to the final vote.

Mr. Zales mentioned that at the April 7th meeting many people were in favor of project for aesthetic reasons only and were not aware of all of the serious concerns and impacts this project would bring to the community. Ms. Patsy Fritz –rock blasting 8 hours per day for 2 years. Dust from blasting is called Silica and would create a (70%) plume that would be sharp dust and will harm lungs as far away as two miles. Mr. Maverick wondered why we did not invite the Fire Dept. Water Dept. and Caltrans to the meeting to discuss the problems with the project. Chair mentioned that all of the letters submitted by these agencies are on line at the County of San Diego Lilac Hills Ranch.

Mr. Labalonski stated that 40% of the cost of a new home is due to regulations

Chair requested that the motion be read once again. Second by Zales.

Four Sponsor Group members present 0-opposed-2 absent-1 vacancy
motion passed unanimously.

Mr. Maverick requested information as to what are the next steps for the project. Chair said that The BCSG comments will go to Mark Slovick County Planning Manager, staff will decide when the project goes to the Planning Commission and then on to the Board of Supervisors.

- b. Mark Masson, Senior Park Project Manager – Presented the latest in the San Luis Rey River Park which is a 1600 acre liner park on both sides of the San Luis Rey River. The Park Department is planning with Caltrans the park land –string of pearls is a design concept that the department is using. Ownership maps with county owned, Caltrans owned and privately owned property were shown. Priority parcels in EIR were identified that were on the map that would be part of the goal of the river park plan. With the expansion of SR-76 (1962) the County worked with CALTRANS to acquire the land. The department is still looking at different access points and the Olive Hill Mitigation parcel which is 290 acres- for additional park use.



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The following questions were asked by Group members:

How much park is planned to be on the freeway side versus residential side? Still purchasing land so answer is not available at this time.

Will a portion of the park be usable in our life time? Can the County do an active park and put in earlier while proceeding with all of the other portions of the master plan?

Caltrans will work with the County on a long term management plan for different parts of the park. Trails are off road and pathway is on pavement. Some volunteer trails will be closed by wildlife agencies on the 290 acre parcel.

- c. Kevin Johnston Land Use/Environmental Planner Champagne Gardens Specific Plan area changes– approved in 1999 expired in 2007. Portion accidentally carried forward and has been added to GPA EIR study. The entire study will add 47 PSR's (Property specific request) to the General Plan that would meet key General Plan policies and the County Rural Commercial Use Regulations.

Mr. Johnston reviewed the pages of the Property Specific Requests GPA Champagne Gardens plan. The second submission was for Sub-Area 1 Site Pictures looking at Sub-Areas 1, 6, and 8 with further review of Sub-Area 1 Site Pictures, Sub – Area 6 Site Pictures and Sub – Area 7 Site Pictures with a verbal discussion of Sub-Area 8. Photo's of this area were on one single sheet of the entire area. The Bonsall Community Plan supports the I-15 Corridor Committees goal of not developing commercial along the corridor. Discussion each of the sub-areas started with sub-area 8 and then jumped to sub-area 6 reviewing the acreage and the portion of this area that could be built on. Mr. Johnston then presented copies of the General Plan Conformance-Key Policies to Consider as well as a County Compatibility Matrix Use Regulations document and a letter from Dan Silver, Executive Director of the Endangered Habitats League.

Further review of sub-area 6-7 continued with discussion regarding Compatibility Matrix and the Rural Commercial Use Regulations. Property owners Mr. & Mrs. Donahue were present and Mrs. Donahue reviewed what had been proposed for the property while it was part of the Champagne Gardens Specific Plan and asking for a portion of the 13.77 acres to be allowed to have a house, restaurant and commercial on a 5.6 acre portion near sub-area 7. Mr. Jim Chagala consultant for the Donahue's presented a power point summarizing the property constraints and what could be developed. Mr. Johnston mentioned he had contacted Rainbow Water and they would not be interested in servicing this area and recommended the boundary between Valley Center Water might be adjusted to serve this area. Ms. Donahue said she already has a meter on the property but was not sure if it was serviced by Rainbow or Valley Center. Mr. Johnston will follow up with the water districts regarding the service. Sub-Area 1 was next to discuss owners representative Ms. Sachi Plummer provided a document titled Champagne Gardens Specific Plan DPLU Case #SP 94-002. Owner is requesting the same use C-40 or C 42 possibly RT-20 that was part of the specific plans regulations previously requested. Chair asked Mr. Johnston if the County had contacted CALTRANS regarding expanding the Gopher Canyon Park and Ride on to sub-area 1.



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Chair called for a vote to extend meeting past the 9:30 P.M. cut off time limit to complete the project being reviewed. Motion by Mr. Schwartz to extend the meeting for 15 minutes Second by Mr. Davis

Meeting continued starting with the with Sub Area 8 a motion by Morgan Second by Zales to apply SR10 on Sub-Area 8 failed 3 in support – 1 against lack of quorum majority.

Mr. Schwartz made a suggestion to have the County of San Diego consider acquisition as open space.

Respectfully submitted by:

Phillip Schwartz



Attachment Page 81

Valley Center Design Review Board

April 12, 2015

TO: Mark Slovick, San Diego Department of Planning and Development Services
RE: **Accretive Investment Group General Plan Amendment PDS2012-3800-12-001, Specific Plan PDS2012-3810-12-001. Rezone PDS2012-3600-12-003, Tentative Maps PDS2012-3100-5571 and PDS2012-3100-5572, Major Use Permit PDS2012-3300-12-005 and Site Plan PDS2012-3500-12-018 (STP)**

Dear Mark,

In response to your recent request for a final recommendation on the Accretive project application, the Valley Center Design Review Board met on April 6, 2015 and again reviewed Accretive Investments' application. (General Plan Amendment PDS2012-3800-12-001, Specific Plan PDS2012-3810-12-001. Rezone PDS2012-3600-12-003, Tentative Maps PDS2012-3100-5571 and PDS2012-3100-5572, Major Use Permit PDS2012-3300-12-005 and Site Plan PDS2012-3500-12-018)

The recommendation of Design Review Board Members (3-0) (1 seat vacant, 1 member absent) is to re-iterate our view that the project fails to meet Valley Center's most basic design objectives. Comments that detail these failures have been submitted previously several times, but the applicants have not in any way modified their proposal.

These comments are attached below.

Respectfully,
Valley Center Design Review Board
Lael Montgomery, Chair
Susan Moore, Secretary
Jeffrey Herr
Keith Robertson

Attached Comments: 17 pages
July 7, 2014
August 11, 2013
February 25, 2013
October 15, 2012
June 14, 2012

Valley Center Design Review Board

July 7, 2014

TO: Mark Slovick, Kristin Blackson, Mindy Fogg, Sami Real, Darren Gretler and Mark Wardlaw
San Diego Department of Planning & Development Services
CC: Oliver Smith, Ann Quinley, Steve Hutchison, Margarett Morgan
RE: **Comments on the Revised Draft Environmental Impact Report for Accretive Investment Group's GPA12-001, SP-001, Master Tentative Map 5571, Implementing Tentative Map 5572.**

The Valley Center Design Review Board has commented extensively in the past on each successive submission of the Accretive SP/GPA and on the DEIR of a year ago. None of our previous comments have been addressed to date. The VC Design Review Board re-submits all the comments we have submitted in the past and asks that they be addressed and responded to, as CEQA requires.

The Accretive SP/GPA remains unchanged in any significant way from the previous submission, the one before, and the one before that. Further, the *Revised* DEIR, like the previous DEIR, persists in steadfastly ignoring significant conflicts with adopted planning documents: Valley Center's Design Guidelines, the VC Design Guidelines Checklist, the Community Plans of Valley Center (and Bonsall) and the San Diego County General Plan. These issues and many others have been identified and discussed over and over again, most recently by the deluge of public comments to the original DEIR that was circulated a year ago. Regardless, the REVISED DEIR reaches the same nonsensical conclusion that this GPA – which amends virtually *every adopted County planning document* -- does not conflict with any applicable land use plan.

It is one thing to confront the realities of a transformational proposal like this one AND then to decide that its benefits outweigh its significant impacts. It is quite another to obscure the obvious Truth of the proposal. We have asked before and we ask again ... what is preventing forthright disclosure of the obvious? How strange and inexplicable it is that today's *professional planning staff fail even to identify issues that caused the department to recommend DENIAL of the PAA for this project just a few years ago. WHY would this be? Whose job is it to enforce the adopted County General Plan? Why is PDS supporting the claim that the baseline condition is NOT the adopted General Plan but, rather, the GP as this project proposes to amend it? Please explain the logic of concluding that this proposal is CONSISTENT with these baseline planning documents when they all must be amended in order to approve this project?*

The VC DRB again **highlights the following critical issues:** *Both Accretive Investment Group's SP/GPA 12-001 and the County's REVISED DEIR fail to identify and/or discuss critical differences between existing plans for this rural area and the plan proposed by the applicant:*

1. The Revised DEIR fails to follow the County's own CEQA procedures for determining significance by failing to analyze Valley Center's Design Guidelines and Design Guideline Checklist against the proposal.
2. The Revised DEIR fails even to address Valley Center's most basic design objective: the Protection of Natural Features. (see pages 8, 10, 15-22 *Valley Center Design Guidelines*). It is ludicrous to argue that grading 4 Million cubic yards can possibly preserve any of the site's natural features. See comments below.
3. The Revised DEIR obscures with circular arguments and double talk the proposal's significant inconsistency also with General and Community Plan Goals and Policies. See comments below.
4. The Revised DEIR also avoids discussion of the LEED Neighborhood Design mandates that the applicant claims the project exemplifies. See article by LEED-ND author, Kaid Benfield, "*Sprawl is Still Sprawl Even If It's Green,*" (<http://www.citylab.com/design/2013/09/sprawl-still-sprawl-even-if-its-green/6756/>), and DRB comments below.

Valley Center Design Review Board

August 11, 2013

TO: Mark Slovick, Larry Hofreiter, Jarrett Ramaiya, Kristin Blackson, Darren Gretler and Mark Wardlaw

San Diego Department of Planning & Development Services

CC: Oliver Smith, Ann Quinley, Steve Hutchison, Margarete Morgan

RE: **Accretive Investment Group's 3rd revised submission (06-21-13):
GPA12-001, SP-001, Master Tentative Map 5571, Implementing Tentative Map 5572
and Draft Environmental Impact Report**

This submission is unchanged in any significant way from the previous submission, the one before, and the one before that. Again, it lacks details that have been requested in the past, and still the issues are major and many. These have been addressed at great length in the comments of our Board (this document contains our previous comments), and in previous and current comments of the Valley Center Planning Group. In this edition of our comments, the VC Design Review Board wants to re-iterate the comments we have submitted in the past. We want to highlight especially that this re-submission still fails to follow the LEED Neighborhood Design mandates that it claims to exemplify, and still fails even to address the proposal's consistency with other General and Community Plan Goals and Policies, analyses which were requested by the PDS staff in 2012. These points are elaborated in order below.

1. The Accretive project fails to follow the LEED Neighborhood Design mandates that it claims to exemplify. It fails to meet required criteria for LOCATION and for NEIGHBORHOOD PATTERN AND DESIGN. (See LEED 2009 for Neighborhood Development, pp. 1-9, and pp. 41-47.)

The San Diego County General Plan (SDGP) sets specific criteria for both the location and internal design of new Village development in *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 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.)*

By referring both to the SDGP "Community Development Model" and to LEED Neighborhood Development Certification standards, this GP policy makes very clear its intention to place special emphasis on the site location AND the site design of Village projects. The choice of LEED **NEIGHBORHOOD DEVELOPMENT** (emphasis added) standards, rather than LEED building standards, is purposeful: LEED Neighborhood Development standards speak specifically to requirements for site location and site design that other LEED building standards do not address.

LEED for Neighborhood Development places emphasis on the site selection, design, and construction elements that bring buildings and infrastructure together into a neighborhood and relate the neighborhood to its landscape as well as its local and regional context. The work of the LEED-ND core committee, made up of representatives from all three partner organizations, has been guided by sources such as the Smart Growth Network's ten principles of smart growth, the charter of the Congress for the New Urbanism, and other LEED rating systems. LEED for Neighborhood Development creates a label, as well as guidelines for both decision making and development, to provide an incentive for better **location**, design, and construction of new residential,

commercial, and mixed-use developments.

- The project fails in the following respects to abide by site location and site design requirements.
- **The site location meets NONE of location options for LEED ND:**
 - Not an Infill Project;
 - Not an Adjacent Site with Connectivity (does NOT have is 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;
 - Not a Transit Corridor or Route with Adequate Transit Service.(The only mass transit remotely near this location are two bus routes 4 miles north of the Project which run the circuit of the 4 Indian Casinos on SR- 76.)
 - No infrastructure adequate to serve urban development exists or is planned. The Accretive project is a compressed suburban sprawl design plopped into a functioning agricultural area where water infrastructure serves irrigation requirements for agriculture. Water and wastewater infrastructure to serve this urban project will have to be completely invented.

 - **The site design fails to meet even the most basic requirements for LEED ND *Neighborhood Pattern and Design***
 - It is too large (exceeds the 320-acre maximum size).
 - It is not "walk-able". The LEED-ND standards were developed through the research of a core committee which that sets the standard for a walk-able neighborhood at no more than 320 acres, with all services, civic uses, employment, and high density housing contained within that 320 acres.
 - It is not compact. The site stretches 2 miles in both directions.
 - Site designs for most of the project neighborhoods are missing. How is possible to claim compliance with LEED Neighborhood Pattern and Design when no "design" exists?
 - The one neighborhood design that is included woefully lacks "connectivity" that LEED ND specifies clearly and precisely. There is no urban grid, no city "blocks" let alone "short blocks" that characterize a "walk-able" neighborhood. To quote LEED ND booklet (pp. 44), the site design is not "*such that its internal connectivity is at least 140 intersections per square mile.*" Nor is the project designed with "*at least one through street and/or non-motorized right-of-way intersecting or terminating at the project boundary at least every 800 feet, or at existing abutting street intervals or intersection.*" Instead, the Accretive 3-town configuration strings together three conventional automobile- centric bubbles, unrelated to one another, each its own suburban sprawl pattern and calls the conglomeration a LEED ND facsimile. Home sites are strung along a meandering road with few intersections with no break between them even for non-motorized trails. This is NOT the distinct urban neighborhood pattern that LEED ND illustrates with innumerable graphic examples in the booklet, LEED 2009 for Neighborhood Development (available on line).
 - It does not have all its residential uses within ½ mile of its "CENTER." The sprawling site requires three "centers" even to claim that its residences are within a ½ mile of the center. Two of these are tiny areas that cannot even in a stretch qualify as "Town Centers." The third, too, very questionably provides urban services and amenities that LEED ND location standards intend.
 - There is no site design for any of these "Town Centers." (Nor is there any requirement in this "Master Plan" Specific Plan that any Town Center is required to actually be built.) How is it possible to claim LEED ND compliance when no site design exists?

2. The Accretive project fails to address the proposal's consistency with other General and Community Plan Goals and Policies, analyses which were requested by the PDS staff in 2012.

To quote the County Scoping letter and the Project Issue Checklist: "**Major Project Issue #1:** *In our February 7, 2011 Major Pre Application Letter, staff indicated that your project was inconsistent with the County's Draft General Plan in Major Project Issue 1. Since that time, the General Plan update was adopted on August 3, 2011. Based on the newly adopted General Plan, County staff has confirmed that the proposed project remains inconsistent with the land use map and numerous General Plan policies.*

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*Staff will be revising and updating the submitted comprehensive Draft General Plan Amendment Report submitted to detail these inconsistencies. Please immediately review the policies and indicate to staff how you would propose to revise these policies or if you disagree with staff's analysis. **If policy revisions are required to the County's General Plan, then the project's EIR must also analyze the impacts to the County's General Plan.***

Where are these analyses? The DEIR refers the reader to the Specific Plan for these analyses.

But, there is no General Plan Amendment Report or any form of GP consistency analysis in the Specific Plan. The applicant argues that a "general plan amendment" (the content of which is never specified beyond a change of Regional Category from Semi-Rural to Village) will somehow make this SP/GPA "consistent" with all the Principles, Goals and Policies that must be revised in the County General Plan, the Valley Center and Bonsall Community Plans, and the Valley Center Design Guidelines in order to accommodate this project. So, what IS going here? Is the plan to subordinate all County and state planning documents to this proposal's parameters without ever detailing what they are?

The Valley Center Design Review Board has detailed in three previous letters the ways that this project is inconsistent, in the first place, with Valley Center fundamental design goals. Our previous comments and questions are incorporated into this document to be absolutely certain they become part of the administrative record as of this date, August 5, 2013, and are also provided the courtesy of a response as required by CEQA.

Very Sincerely,

Lael Montgomery, Chair
Robson Splane, Vice Chair
Susan Moore, Secretary
Jeff Herr
Keith Robertson

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Valley Center Design Review Board

February 25, 2013

TO: Mark Slovick, Larry Hofreiter, Jarrett Ramaiya, Kristin Blackson, Beth Murray and Mark Wardlaw
San Diego Department of Planning & Development Services
CC: Oliver Smith, Ann Quinley, Steve Hutchison, Margarete Morgan
RE: **Accretive Investment Group's 2nd revised submission (02-13-13) GPA12-001, SP-001, Master Tentative Map 5571, Implementing Tentative Map 5572**

Why is this applicant permitted to abuse the process?

Ordinarily we appreciate the opportunity to comment on projects that are being proposed for our community. We are accustomed to working closely and amicably with real estate developers, especially of Village projects, to develop plans that reflect the community's vision. We very much look forward to the completion of Village projects in Valley Center's central valley which have been planned for many years. This is the traditional heart of Valley Center where businesses, churches, schools, playing fields, and library are located, where very significant road infrastructure improvements were completed several years ago at a cost to the taxpayers of some \$50 Million, where wastewater treatment facilities are located and low-interest state loans have been secured for expansion. Here Village residential and commercial development will be welcomed.

In glaring contrast, we are deeply disturbed and alarmed by this project and this application. Review after review of a proposal that fails repeatedly to respond to previous comments seems to be a design to demoralize the staff and discourage community participation.

This project is a sad anomaly that continues to disappoint citizens who care deeply about our community. Though the applicants claim to have "worked with the community", in fact they have done whatever they can behind the scenes to undermine what state law defines as the "constitution of land use" and what tens of thousands of San Diego County citizens understand and depend upon as a kind of contract with our County government -- our County General and Community Plans. These applicants share San Diego County with hundreds of thousands of citizens who are invested in the region's plans for the future and who benefit collectively by a common set of rules. What encourages and then allows this applicant to bull and bully its way past procedures that everyone else follows? From the get-go this applicant has gamed the system, disregarded the processes and products of public planning, misrepresented basic and essential facts, ignored input and correction. On and on it goes, seemingly endless deviations from standard protocols are tolerated. From the sudden appearance of a surprise Specific Plan Area on Valley Center's land use maps in 2008, through the Planning Commission's approval of the PAA application (against staff's recommendation AND contradicting the Commission's unanimous endorsement of the General Plan Update just weeks before), and now to this 2nd iteration -- the review process has been corroded and frustrated. Why is this applicant permitted to abuse the standard process, and what will become of San Diego County when we all abuse the system similarly?

Concerning this submittal and the process:

Except for increasing commercial square footage (75K SF to 90K SF, increasing hotel beds (20-50) and adding kitchenettes to 200-units in the group home facility (more intensity, not less) and a few minor changes -- this submission is unchanged from the previous submission and the one before that; and, again, it is incomplete. This submission lacks details that have been requested in the past; it also lacks a letter from the applicant which, according to County protocol, is required to explain how the new submission

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addresses the Project Issue Checklist. (The Project issue Checklist is the 364 page document, prepared by the PDS staff and released in December 2012, which lists more than 1000 items that the applicant needs to address.) Without this letter one can only guess whether the applicant is misunderstanding, overlooking, ignoring, or merely defying the issues that have been raised several times already by staff and community groups.

Nevertheless, despite missing pieces, community groups have been given 30-days to review the material and submit comments to the County. At the same time, evidently, the applicant has been given a 60-day extension to submit the Project Issue letter and has submitted "some studies" for the staff to "preview". Information about which studies have been submitted is not being made available to the community. Nor can anyone predict, obviously, how these will be assessed and what revisions may be requested by staff after they have been previewed. As a result of these considerable uncertainties, several of us suggested that formal community review should be delayed until the resubmission is complete rather than pushed forward with so many missing pieces. We were told accommodatingly that we could submit our comments anytime -- but within 30-days if we wanted our comments to be included in staff's comments. Given the infamous "one-bite policy" and the fact that this project threatens to set aside Valley Center's entire community plan, volunteers who are reviewing this project on behalf of the community feel that we cannot risk being told in a few months that we had a chance to comment -- and chose not to. So we are complying with the 30-day deadline even though compliance requires volunteers to drop everything, hold special meetings and respond immediately to yet another incomplete submission, and do it all over again in 60 days. All this is to accommodate an applicant who requires one extension after another, who is also unresponsive to staff and community comments and ignores County protocol.

This said, after reviewing the Specific Plan text and maps which show zero effort to remedy the project's basic problems, it's hard to imagine what a Project Issue Letter from this applicant might add (more frosting on a missing cake?) We will all have to wait for the long-anticipated "studies" to understand the substance of the applicant's plan for this property. At this point, issues we raised in September 2012 and the previous June 2012 all remain unaddressed.

In addition to our previous concerns, which are attached, we emphasize the following:

SPECIFIC PLAN

The Specific Plan text is still riddled with wiggly information and assertions that are contradicted by the facts. This creates a confusing stew: information too vague and mutable to assess, indecipherable nonsense, and plain misrepresentations of the truth -- all dangerous in a serious planning document. A Specific Plan is not a sales pitch. It is a proposal to amend and then to implement the San Diego County General Plan. This particular Specific Plan will govern the development of an entire new city of 5000-people. This proposal DOUBLES the growth planned between now and 2020 for the entire 55,000 acre planning area. According to SANDAG's Regional Growth Forecast Valley Center adds 989 homes between 2010 and 2020. The Accretive project alone proposes twice that on just 608 acres: 1746 homes, a 50-bed hotel, a 200-unit (bedrooms & kitchenettes) group care facility and 90,000 SF commercial.)

Vague and inconsistent particulars are too numerous to list. As every reviewer has exclaimed, there is no definitive plan beyond the plan to explode the development potential of this rural area by more than 1800%. Design vignettes and "conceptual" layouts are meaningless substitutes for genuine design standards and a commitment to a specific approach. Even unit allotments for each phase are subject to change. Virtually the entire "masterplan" is one concept that is subject-to-change laid over another concept

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that is subject-to-change. Nothing about this project is clear except the statement that this nebulous Specific Plan will prevail over every official County planning document. Processing should be halted until the Specific Plan is, at least, complete, factually correct and internally consistent. It is none of these.

The plan is laced with ludicrous claims, misrepresentations and outright inaccuracies, again too numerous to detail here. However, to assist the fact checkers, the whoppers are most pervasive in sections that pertain to community character, both the character of the proposal and the character of other properties in the area. Perhaps because “consistency” with legal planning documents and “compatibility” with existing and planned development on the ground is, one would hope, requisite for approval of this proposal, the applicant persists in these claims whether or not they make any sense. For example:

1. MIS-CHARACTERIZATION OF EXISTING SPECIFIC PLAN AREAS IN VALLEY CENTER

Page I-10, Section H, 1st paragraph

ASSERTION: *“the Valley Center planning area has a number of existing specific plans ... containing large scale urban development”*. This is not true. Specific Plans in VC have a minimum of 40% open space and, with the exception of a section of Orchard Run, are built or clustered at Semi-Rural densities. The VC Community Plan lists the facts of these 7 Specific Plans:

1. Lilac Ranch: permanent open space preservation
2. Circle R Resort: recreational community on 361 acres. Density 1 du:2ac clustered
3. Live Oak Ranch: 307 acres. 40% preserved in open space. Clustered 1du:1ac minimum lot size
4. Ridge Ranch I: 138 acres, 25 homes. 1 du: 5acres
5. Ridge Ranch II: 687 acres, 108 homes. 1du: 6 acres
6. Woods Valley: Village golf course community on 437 acres. 40% preserved in open space. Clustered 1du:min 1/2 acre
7. Orchard Run: Village core community on 118 acres. Minimum 40% open space. Density from 1.5 du:ac to 7.3du:ac

2. MIS-CHARACTERIZATION OF SURROUNDING RESIDENTIAL DEVELOPMENT PATTERNS

Page I-10/11 2ND paragraph

The applicant claims that a Metroscan analysis *“documents a robust diversity of parcel sizes”* within a five mile radius of their site. This “study” misses the mark completely and comes to a preposterous conclusion that a drive through the area would reveal. The study overlooks hundreds of acres of open space that characterize the resort and recreational communities along Old 395. These are not spot-zoned urban enclaves as the applicant’s study mis-concludes, but are mainly recreational destinations that advertise their country settings, recreational amenities, wildlife and so forth.

1. Circle R Resort: recreational community on 361 acres. 118-acre golf course. Homes clustered. Underlying density 1 du: 2 acres.
2. Lawrence Welk Resort: vacation resort on 600-plus acres. 326 vacation villas. Two 18-hole golf courses, 8 swimming pools, 5 recreational areas, small retail area to serve vacationing guests.
3. Champagne Lakes RV Resort: RV vacation resort on 50 acres. RV campsites. The resort website says, “The resort is 50 acres of nature and wildlife preserve with 3 lakes that are fed by the local mountain streams. Wild ducks and geese have made these lakes their homes for over 40 years.”
4. Lake Rancho Viejo, which IS a Fallbrook CPA residential community on 469 acres, allows an overall density of 1.48 dus:ac. Flood plain and uplands are preserved open space.

3. MISCHARACTERIZATION OF THEIR OWN PROJECT

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Assertions about their project are not supported and, in many cases, are contradicted by the applicant's own plan. For example: The assertion that "natural landforms remain" is ludicrous when 4 MILLION cubic yards will be graded, and 20% of that blasted. (For comparison, 4,000,000 cubic yards of dirt is just shy of the amount of concrete in Hoover Dam, enough to build a 2 lane road from Seattle, Washington to Miami, Florida or a 4 ft. wide sidewalk around the Earth at the Equator.) Nothing could be less "natural" than grading and compacting 80% of the site, creating 20-30-foot cut/fill slopes (two and three stories high!) and lining streets with row upon row of identical symmetrical lots.

More than 80% of the site will be bulldozed, blasted, stripped of organic material, compacted and covered solidly by development; the narrow ribbons of biological open space (less than 20% of the property) that lace through the blasted, bulldozed "natural contours" will be massively impacted: 265 acres will be covered in home sites, 75 acres in "manufactured slopes", 83 acres in asphalt, 40 acres in facilities, a mere 23 acres in parks (see #4).

This is a from-scratch city with MORE HOMES, PEOPLE AND CARS than the City of Del Mar on HALF THE LAND AREA. (City Data: Del Mar: 1.8 square miles, population 4224. The Accretive project: .95 square mile, population 5063.) The project is NOT in accord with the General Plan Community Development Model as the applicant claims. Quite to the contrary, the project defies the General Plan and corrodes its integrity. The applicants propose to explode a 608-acre city in the middle of the rural countryside without adequate feathering or buffering to soften impacts on neighboring farms, rural estates or even biologically sensitive creek beds.

The site is NOT COMPACT, as the applicant claims. It stretches two miles in each direction, with some 8 miles of edge effects. The project is NOT WALK-ABLE, the sprawling configuration of the Accretive site requires the design of three separate Town Centers to justify the contention that this is a pedestrian community; it is an automobile-dependant community. The project quite obviously does NOT meet the most basic location criteria for LEED Neighborhood Development. This is NOT an in-fill site with existing infrastructure; this is a rural site. Building 1746 homes here quite obviously does NOT reduce the need to build and operate new road networks, emergency and law enforcement facilities, libraries, schools, parks and other public services; it CREATES the need to build all of these on green fields that are many miles from jobs, transit, shopping, churches, movie theaters and other accoutrements to support a population of this size. The project does NOT reduce development impacts or reduce traffic trips; it creates devastating impacts and adds thousands of cars to rural roads. The site plan does NOT integrate development into the natural features of the property; it obliterates the natural features of the property. Moreover this project's edge effects will cause the destruction of about 2000 acres of rugged, remote and rural property where hundreds of families have invested in a rural quality of life.

Absolutely NOTHING of the natural site or the rural lifestyles of the people who live there will remain. The applicant needs to quit claiming otherwise. The project requires extremely significant amendments to the General Plan and to the Valley Center and Bonsall Community Plans because it completely overturns these public visions. Period.

4. PARK AREA FAILS TO MEET THE COUNTY STANDARD

The County standard for parks per 1000 residents is 10 acres of local parks, and 15 acres of regional parks. This project seems to provide 23 acres for 5063 people, less than half than the standard, and in an area where very dense development requires MORE parks, not less. Phase 1 of this project (350 houses/1000 people on 62 acres) requires 10 acres of parks, it has 3.2 acres; Phase 2 (466 houses/1351 people on 36.3 acres) requires about 15 acres of parks, it has 3 acres ... and so forth.

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A point quite minor in the context of everything else: there are no proposed tree/plant species listed for "Parks" in either the Conceptual Landscape plan or the specific plan text, even though there are symbols and a proposed layout.

5. PREEMINENCE OF THE COUNTY GENERAL PLAN

The Specific Plan states on page II-2 that, in the case of conflicts or discrepancies between the Accretive project Specific Plan and the County's General Plan, the Valley Center and Bonsall Community Plans, and County development regulations and zoning standards, the Accretive Specific Plan will prevail. State law requires consistency across these documents, there should be no "conflicts or discrepancies". A Specific Plan is required by law to implement the General Plan and Community Plans, and cannot "prevail" over them. This language should be revised for its inconsistency with state law while the entire Specific Plan should be purged of marketing braggadocio and revised as a serious planning document to reflect its proper place in the hierarchy of legal planning documents.

6. AUTHORITY OF VALLEY CENTER DESIGN REVIEW

References to the "authority" of Valley Center Design Review are splayed through the Specific Plan, most prominently in Section III. We believe that this Village project is subject in its entirety to Valley Center Design Review and Valley Center's Design Guidelines based upon the information in the Introduction of the Guidelines themselves, the content of the booklet overall and the fact that the VC Design Review Board has reviewed every commercial, industrial and residential project that has been proposed for the North and South Villages. We have worked closely with developers of these areas for more than ten years. Although residential development on Semi-Rural and Rural parcels outside our "Country Town" (now called "Village") area is NOT subject to Design Review, planned residential development proposed for our Village areas has always participated in design review in accord with our understanding that Village design is the intended focus of the County design review program.

The Specific Plan text also asserts or implies in several places in Section III that Valley Center's Design Guidelines will also be replaced by the applicant's Specific Plan. This applicant's Specific Plan requires considerably more attention to design, and more elaboration of standards for this particular project, for this Specific Plan to merit authority. The entire planning and design community recognizes the importance of forethought and thoughtful design to the functioning of even the tiniest place, let alone an entirely new city. Again, the content of this Specific Plan is severely inadequate to perform this responsibility.

Our previous comments still apply and are attached.

Respectfully,
Lael Montgomery
Robson Splane
Susan Moore
Jeff Herr
Keith Robertson

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Valley Center Design Review Board

October 15, 2012

TO: Mark Slovick, Jarrett Ramaiya, Rich Grunow, Mark Wardlaw San Diego Department of Planning & Development Services

RE: **Accretive Investment Group revised submission (09-25-12) GPA12-001, SP-001 Master Tentative Map 5571, Implementing Tentative Map 5572 and respective grading plans.**

The Valley Center Design Review Board met on October 9, 2012 to again discuss Accretive Investment Group's proposal for the West Lilac triangle in light of September's revised submission. We were disappointed that neither the applicant nor the political consultant, Chris Brown, attended the meeting because the DRB Chair had expressly invited Chris Brown to present the revisions.

Comments Focus on Macro Planning Issues:

The revised submission fails to remedy the basic problems with the proposal which we addressed in our comments of June 14, 2012, which are attached below. Therefore, our comments continue to focus on macro development issues.

- 1) This is still an urban project in a rural area.
- 2) The proposal fails in the same basic and essential ways as the previous submission to respect Valley Center's rural character and its most fundamental design principles.
- 3) New sections describing lot, architectural and landscape design follow the same pattern.
For example:
 - a. "Conceptual Architectural Elevations" shown are generic in nature and have no relevance to the site, its surroundings or to the community in general. Pages 25-37 of the Valley Center Design Guidelines specifically incorporate the design principles of Early California Architecture which reflect the character of the state's early missions and adobes. None of the proposed elevations reflect any of these design principles.
 - b. Lot designs, also generic and out-of-context, ignore both spirit and letter of Valley's Center Guidelines and depict exactly the monotonous development that Valley Center wants to avoid.
 - c. Landscape design is uniform and urban; species selected are ill-advised in some cases for particular locations (eg. fruit trees for road edges and medians) and in other cases for Valley Center microclimates.
 - d. The proposal further ignores requirements for private open space in accordance with the County of San Diego Zoning Ordinance Section 4915: a minimum of 200 square feet per dwelling. Further, the design recommendations call for private open space on the ground to be a minimum of 10 feet in length and width and should be screened from public view by landscaping, a wall, privacy fence or other acceptable method. None of the proposed configurations meet this requirement.
- 4) The proposal provides no evidence that the project is necessary: the new County General Plan already accommodates more growth than SANDAG projects for 2030. There is no demonstrated need for increasing the capacity of the new GP by building a new city many miles from existing infrastructure and services. The proposal fails to justify a change of GP Regional Category from the largest SEMI RURAL parcels (SR-10 and SR-4) to VILLAGE densities as high as 27 dwellings per acre; a 1587% increase in dwelling units (from a total of 110 units allowed under the current GP to 1746).
- 5) The Master Planning approach avoids showing the locations and relationships of residential lots, interior streets and other elements of the site design. This also avoids revelation of site development issues that should deeply concern decision-makers as they consider such extreme and precedent-setting transformation of this rural property. Out-of-sight = out-of-mind looks to be an overall strategy for this application.

- 6) The Master Planning approach coupled with GP Policy LU-1.8 (which the applicant cites to argue that densities can be transferred across land use designation boundaries) make the entire proposal, first, too vague and, second, too mutable to take seriously. This application is a one-way street that asks unprecedented density increases for – what exactly? What IS specific about this Specific Plan?
- 7) The applicant's political consultant insists that "Master Planning happens all the time" and that this project is "the same as the 4-S Ranch project". However, fundamental differences are obvious: the 4-S Ranch project was CONSISTENT with General Plan Regional Categories, Goals and Policies, and Land Use, Mobility and Conservation Elements. 4-S Ranch was inside the existing Current Urban Development Area (CUDA). This urban project proposes -- for the sole benefit of a single private real estate speculator/developer -- profound revisions of County public planning policy as well as the complete transformation of the rugged and rural countryside.
- 8) **The proposal is riddled with Orwellian "doublethink" and other convoluted logic.** (Orwell defines "doublethink" as accepting two mutually contradictory ideas or beliefs at the same time)
A few examples are:
- destroying agriculture conserves agriculture;
 - adding 1746 homes/ 5000 residents to back-country roads improves traffic;
 - "compact" urban development of this rural area allows for increased open space and natural habitat;
 - grading 4 million cubic yards of dirt respects natural landforms and preserves natural resources;
 - pronouncing the Accretive site a "Smart Location" under the LEED ND Certification Program when the project will actually *BUILD* the "Nearby Neighborhood Assets" that LEED ND certification requires as a pre-requisite. (By this logic LEED ND criteria can be manipulated to justify urban development of any Semi-Rural location.)
 - insisting that the Accretive GPA/SPA is in accord with the GP Community Development Model simply because their context-free development plan is a New Urbanist design. (Again, by this logic, new cities can be plopped into any Semi-Rural or Rural area – NOT what most stakeholders believed was the intention of the new San Diego County General Plan.)
 - (*And, incredibly for a GP Amendment that seeks to overturn the last 12 years of work on the parts of hundreds of planners, residents, and property owners to create the new San Diego County General Plan*) ... calling on "General Plan Consistency" to declare that Valley Center and Bonsall Community Plans cannot be allowed to interfere with the applicant's audacious ambitions to re-write them!
- 9) **The proposal is also rife with errors, distortions and/or misrepresentations.**
A few examples are:
- Claiming that Lilac Ranch and Circle R both are consistent with the proposal's Village densities. Both are, in fact, inconsistent. Lilac Ranch is permanent conservation land and Circle R is a CLUSTERED Semi-Rural project (underlying residential density is 1du:2 acres);
 - Slopes mapped with 10-foot contours reveal significantly less coverage in 25% slopes than County standard contours;
 - Claiming that the project site is ½ mile from the I-15 without citing that road construction along the route the crow flies is prohibited by a mountainous ridge;
 - Touting "walkable" design when the project site jigs and jags across two square miles and requires three retail nodes in order to claim "walk-ability." More than half the homes, including Senior and Assisted Living neighborhoods, are a mile and a half from the Village Core. This is an automobile-dependent community.
 - Asserting "compact development" when edge-effects of this sprawling configuration impact adjacent rural properties for a distance of some 8 miles.
 - Extolling "planning collaboration" with the Valley Center community. This is an overreach that abandons reality in order to invent points toward LEED ND certification. For several years the Accretive Investors have held, not community meetings by any stretch of the term, but closed

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"private" meetings with cherry-picked supporters. Meetings have pointedly excluded, sometimes disinvited, folks who have voiced opposition to the project, particularly those people who are most familiar with County planning history and the rationale underlying the new General and Community Plans.

Contained in the 82-pages of the Valley Center Design Guidelines are numerous diagrams and sketches, as well as lengthy descriptive copy that make all of these points, and others, quite clear. The Design Guidelines themselves are meant to work together to produce an integrated, whole objective. They cannot be cherry-picked and also produce their intent.

As in any "design", success is a result of combining the right design elements in the right way – in the right place. This project appears off the mark on all counts.

Our comments dated June 14, 2012 continue to apply. Please refer to them, beginning on the next page.

The Valley Center Design Review Board
Lael Montgomery, Chair
Jeff Herr
Susan Moore
Keith Robertson
Robson Splane

Valley Center Design Review Board

June 14, 2012

TO: Mark Slovick, Rich Grunow, Jarrett Ramaiya, Jeff Murphy
San Diego Department of Planning and Development
RE: **Accretive Investment Group GPA 12-001, SP 12-001, Master Tentative Map 5571,
Implementing Tentative Map 5572 and respective Grading Plans**

1. Insufficient Detail

The applicant has submitted maps and documents that lack sufficient detail for the group to understand any the development plan for this property. Further, there has been no presentation of the project by the applicant; as a result the most basic facts of the development plan remain murky.

The applicant has filed this GPA/SPA much earlier in the project-development process than developers who have co-developed their plans through community meetings before filing a GPA or an SPA. Therefore, we are accustomed at the point of application to having much greater familiarity with a project, and to the provision in the application documents of considerably more detail.

Neither the DRB nor the Planning Group has worked with this applicant in the way we have worked with the developers of the North and South Village where the land uses proposed have been in accord with the community plan, which is not the case with this project. We received a copy of the Specific Plan Text on Tuesday 6/5/12. Chris Brown encouraged the group to take more time with our review and comments on the text. (He said he is requesting an additional 30-45 days from the County.) However, from a cursory reading, the SP Text fails to provide sufficient additional substantive information to warrant any delay.

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Considerably more detail about the overall development plan is necessary. We understand from the County planner, Mark Slovick, and from the developer's consultant, Chris Brown, that there will be revised iterations of the project. More detailed comments will come in response to more detailed plans.

2. Focus of Comments.

Our comments at this time are focused in areas which are pre-requisite for any development proposal to meet Valley Center's community character objectives.

3. Project Undermines the Vision for VC.

DRB members believe that this project fails in basic and essential ways to respect Valley Center's rural character and its most fundamental design principles. If approved, this General Plan Amendment would upzone this property by about 2000% to allow 1746 dwellings and three commercial areas. The Regional Category would change to Village from its recently-approved GP Regional Category of Semi-Rural which allows approximately 350 homes on 2, 4 and 10 dwellings per acre.

The imposition of an artificial "village" in Valley Center's rural countryside dismantles the community's recently-approved Community plan. County planners along with Valley Center residents, property owners and developers have invested hundreds of hours, and extensive public and private resources to create the VC Community Plan, and to plan the private Village development to support it. This work was approved by the Board less than a year ago. VC's plan is a two-part growth strategy: first, 25% of the future growth is compact "infill" development of two existing Village "nodes" in the central valley along Valley Center Rd; second, residential density feathers from the village core to Semi-Rural and Rural designations in remote, hilly, fire-prone areas to the east, north and west. These "green-field" areas, in accord with principles of the new General Plan, also "buffer" the community from adjacent communities. This is a classic "Smart Growth" plan, it concentrates intense development in the Village area which has evolved over the last 150 years as the business "crossroads" of Valley Center, as has been the formal intention since the first community plan of the 1960s, and it retains existing larger parcels for agriculture, horticulture and animal husbandry that have historically characterized Valley Center.

This faux Village both undermines the plan to attract new businesses and residential vibrancy to existing genuine Village areas AND destroys greenfields, as well.

The following comments refer directly to particular VC Design Guidelines. We have not re-typed the Guidelines here. Please refer to the pages that are cited below.

4. P 3. The Purpose of Design Review

Comment: The proposed project fails to consider the community context in which it takes place, and fails to make an effort to develop a compatible relationship to the natural setting, neighboring properties and community design goals.

5. P4/10 Community Design Objectives

Comment: The proposal ignores the most fundamental of Valley Center's Design Objectives, which is to PRESERVE NATURAL FEATURES and OPEN SPACES. For starters, the project will move 4.4 MILLION cubic yards of dirt on 608 acres. Do the math. There are 3,291,200 square yards in 608 acres. This means *the project will move more 1 ¼ cubic yard of dirt for every square yard of the property*. Natural land forms, vegetation and wildlife will all be obliterated.

This development plan completely disregards Valley Center's "strong requirements for the protection of existing natural features (that are) provided in the Design Guidelines for new development" (among them)

'special measures to preserve oaks and sycamore trees, significant resources that contribute to the character of the valley and the community.' The applicant should address how grading, scraping and denuding what looks to be at least 80% of the site reconciles with being sensitive to the natural environment?

6. P16. Site Analysis

Comment: No site analysis has been submitted. The site design process should begin with a thorough analysis of the site.

7. P17. Site Design Concept

Comment: General Criteria 1 and 2: There is no evident effort for the project design to comply at all with these criteria. The project ignores the rural residential character of the area, and destroys all of its natural features. As for General Criteria 3 and 4, the application does not include enough detail to determine anything about the internal integrity of the project. We will say, however, the pre-requisite site location issues make internal design details quite irrelevant. All of its failures to comply with the community's design objectives are rooted in this basic incompatibility of locating urban development in a rural area.

8. P18-22. Protection of Natural Features (to include Oaks and Sycamores)

The Guidelines state, "All development proposals shall demonstrate a diligent effort to retain existing natural features characteristic of the community's landscape. Existing topography and land forms, drainage courses, rock outcroppings, vegetation and views shall be recorded in the Site Analysis and incorporate, to the maximum extent feasible, into the future development of the land." See pp. 18-19 items A-H, all numbers under each item, noting the general rule, the "hand of man" is to be felt lightly", And pp. 20-22 about mature tree preservation and handling.

Comment: No effort evident. How much of the natural environment will be left... out of how much destroyed? How many trees? Rock outcroppings? Natural canyons? Hilltops? And so forth.

9. P26-35. Architectural Character and Compact Building Groups

Comment. Chapters 5 and 6 in Part III of VC's Design Guidelines address the array of requisite site planning and architectural approaches, and the ways these elements of design must be combined in order to produce Village development that aligns with historic patterns. Based both on the Master and the Implementing Tentative Map and Grading Plans, the Accretive plan for Village housing shows hyper-conventional suburban sprawl, little rectangular lots lined up cheek-to-jowl like rows of teeth on both sides of every road, obscuring from view the very countryside the plan claims to celebrate.

The Specific Plan Text for this project waxes rhapsodically about "Italian Hill Villages" that bear no resemblance to Accretive's development plan for this property. Italian hill villages are characterized, first and foremost, by their location at authentic "crossroads" and their gradual development to meet the authentic needs of the surrounding authentic community; and are further characterized by their irregularity and by the charm of a built environment arranged around the natural environment. The Accretive project is a rote suburban tract overbuilt to urban densities, sprawled across remote, roadless greenfields.

Nothing but a complete revision of this plan would hope to achieve what the Guidelines or the Specific Plan Text for this project describes.

Italian hill villages are characterized by their locations at authentic well-travelled "cross-roads", by the charms of irregularity and diversity, and by the arrangement of the built environment around the beauty of the natural landscape.

The Accretive plan imposes a monotonous sprawling geometric sameness on a contrived cut and filled landscape in a remote location. Below is a photograph of this developer's San Elijo project that shows cuts in landscape similar to their plan for West Lilac.



10. P67. Hillside Development

Comment: The applicant's development plan will destroy the natural topography in this area and "re-grade" the land. The applicant's consultant asserts that that "contour grading" of home sites -- so that each little geometric rectangle is a few feet higher or lower than its immediate neighbor -- is the same as retaining the natural organic land forms. This is a ludicrous assertion that demonstrates the extreme extent to which this proposal contradicts the most basic concepts of rural design.

11. Landscape Concept

Susan Moore's Comments: The master TM lacks sufficient detail for a thorough review. However, from the documents that have been submitted, I can make the following comments. In my opinion, following the lot design as it does, the landscape plan is also an urban concept that needs to be completely re-done to be compatible with the property's rural surrounds. To create the "natural" character of Valley Center requires an organic, asymmetrical landscape design.

As for plant material, there are too few species; diversity (of trees, shrubs and ground covers) needs to be much greater. Several specified trees will not grow well in our zone generally and will definitely not succeed in Valley Center's colder micro-climates. Another is an allelopathic variety (suppresses growth of different plants other than itself due to release of toxic substances) tree listed for medians/entries where other plants are listed. Trees listed for the medians will not grow due to conditions that characterize road medians. "Grove" trees will not thrive in road median conditions and will be messy for automobiles and pedestrians. Fruit-producers are typically specified AWAY from streets and sidewalks where human activity is present.

Contained in the 82-pages of the Valley Center Design Guidelines are numerous diagrams and sketches, as well as lengthy descriptive copy that make all of these points, and others, quite clear. The Design Guidelines themselves are meant to work together to produce an integrated, whole objective. They cannot be cherry-picked and also produce their intent.

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The Valley Center Design Review Board

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Lael Montgomery, Chair
Jeff Herr
Susan Moore
Keith Robertson
Robson Splane

Gungle, Ashley

From: Steven Hutchison <hutchisonsm@gmail.com>
Sent: Thursday, April 16, 2015 10:51 AM
To: Slovic, Mark
Subject: Lilac Hills Ranch VCCPG Recommendation
Attachments: AreasOfControversyApprovedApril13-2015.docx

Mark,

Attached are three documents [2 .jpg and 1 Word] that you requested from the Valley Center Community Planning Group re Lilac Hills Ranch. Included are the two forms you sent me for the Project along with a separate set of comments referenced in section A of the second form. As you may know by now, the VCCPG voted 11-2-0 [Y-N-A; with one vacancy and one recusal] to reject the project. We had probably the largest audience we have ever had for a VCCPG regular meeting and the minutes will reflect numerous audience speakers, for and against the project. I have received a formal request from Patsy Fritz for copies of the speaker slips submitted and the preliminary minutes for the LHR item, which I will provide, probably tomorrow. smh



County of San Diego, Planning & Development Services
**COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT RECOMMENDATION**
ZONING DIVISION

Record ID(s): PDS 2015-3801-12-001 CPA; PDS 2012-3801-12-001 SP

Project Name: Lilac Hills Ranch

Planning/Sponsor Group: VALLEY CENTER COMMUNITY PLANNING GROUP

Results of Planning/Sponsor Group Review

Meeting Date: 13 APRIL 2015

A. Comments made by the group on the proposed project.

SEE ATTACHED

B. Advisory Vote: The Group Did Did Not make a formal recommendation, approval or denial on the project at this time.

If a formal recommendation was made, please check the appropriate box below:

- MOTION:
- Approve without conditions
 - Approve with recommended conditions
 - Deny
 - Continue

VOTE: 11 Yes 2 No 0 Abstain 2 Vacant/Absent ^{Recused}

C. Recommended conditions of approval:

N/A

Reported by: STEVEN HUTCHISON Position: SECRETARY Date: 16 APRIL 2015

Please email recommendations to BOTH EMAILS;
Project Manager listed in email (in this format): Firstname.Lastname@sdcounty.ca.gov and to
CommunityGroups.LUEG@sdcounty.ca.gov

5510 OVERLAND AVE, SUITE 110, SAN DIEGO, CA 92123 • (619) 565-5981 • (800) 257-8770
<http://www.sdcounty.ca.gov/pds>





County of San Diego, Planning & Development Services
**COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT REVIEW**
ZONING DIVISION

Record ID(s): PDS 2015-3800-12-001 GPA; PDS 2012-3801-12-001 SP

Project Name: Lilac Hills Ranch

Project Manager: MARK SLOVICK

Project Manager's Phone: 858 495 5172

Scope of Review:

Board Policy I-1 states: "groups may advise the appropriate boards and commissions on discretionary projects as well as on planning and land use matters important to the community." Planning & Development Services (PDS) has received an application for the project referenced above. PDS requests that your Group evaluate and provide comment on the project in the following areas:

- The completeness and adequacy of the Project Description
- Compatibility of the project design with the character of the local community
- Consistency of the proposal with the Community Plan and applicable zoning regulations
- Specific concerns regarding the environmental effects of the project (e.g., traffic congestion, loss of biological resources, noise, water quality, depletion of groundwater resources)

Initial Review and Comment:

Shortly after an application submittal, a copy of the application materials will be forwarded to the Chair of the applicable Planning or Sponsor Group. The project should be scheduled for initial review and comment at the next Group meeting. The Group should provide comments on planning issues or informational needs to the PDS Project Manager.

Planning Group review and advisory vote:

- A. **Projects that do not require public review of a CEQA document:** The Group will be notified of the proposed hearing date by the PDS Project Manager. The project should be scheduled for review and advisory vote at the next Group meeting.
- B. **Projects that require public review of a CEQA document:** The Chair of the Planning Group will be notified when an environmental document has been released for public review. The final review of the project by the Group, and any advisory vote taken, should occur during the public review period.

As part of its advisory role, the Group should provide comments on both the adequacy of any environmental document that is circulated and the planning issues associated with the proposed project. The comments provided by the Group will be forwarded to the decision-making body and considered by PDS in formulating its recommendation.

Notification of scheduled hearings:

In addition to the public notice and agenda requirements of the Brown Act, the Group Chair should notify the project applicant's point of contact and the PDS Project Manager at least two weeks in advance of the date and time of the scheduled meeting.

5510 OVERLAND AVE, SUITE 110, SAN DIEGO, CA 92123 • (658) 565-5961 • (806) 267-6770
<http://www.sdcountry.ca.gov/pds>
PDS-534 (Rev. 09/04/2013)

A. Valley Center Community Planning Group [VCCPG] Comments on the Proposed Lilac Hills Ranch General Plan Amendment and Specific Plan [PDS2015-3800-12-001 GPA; PDS2012-3801-12-001 SP]

The Valley Center Community Planning Group has been reviewing this project for several years. Little of substance has changed in the Project's design and plan over the course of many review cycles, despite voluminous comments on deficiencies and inadequacies in such basic aspects as consistency with the County General Plan, consistency with Community Plans, project location, infrastructure, public services and environmental impacts. To date, we have seen no responses to the hundreds of pages of comments submitted.

We, as a group, have commented on two Environmental Impact Reports [EIR] and at least four versions of the Specific Plan for this Project. In those comments we have identified numerous areas of contention and controversy with respect to representations made about the Project. We have also suggested an alternative to the Project that has been too hastily disregarded by the applicant and the County staff.

Below are some of the areas of contention and controversy that have been reported in greater detail in the VCCPG comments on the Revised Draft EIR for this Project:

1. Project's Inability to Acquire Legal Right-of-Way

There needs to be a frank and succinct discussion of the Project's lack of legal right-of-way [ROW] for roads, sewer, and recycled water. The discussion needs to make clear to decision-makers how offsite improvements required for this Project will be acquired. There are 30 or more ROW acquisitions that the Project requires. The Project has made little progress in four years on acquiring required ROW. It is highly likely that the use of eminent domain for a minimum of thirty and likely a greater number of separate takings of unwilling property owners' land or interests in road and utility easements will be required to make this project feasible.

The County of San Diego has received hundreds of pages of factual information from multiple attorneys that demonstrate the absence of many legal rights for the Project's intended use of private roads and ROW for sewer and recycled water utility pipelines.

The County has taken the position that private road ROW disputes are between individual private parties. However, the County of San Diego has certain knowledge that offsite road improvements for the Project will require

the County's use of eminent domain to acquire ROW for the Project.

The County needs to disclose information for the Project and each of its access alternatives so that impacts are identified and required mitigation can be implemented.

A. There are a few proposed scenarios for the improvement of West Lilac Road in relation to the Project. These include widening and straightening the travel lanes, adding features at the road edge and adding roundabouts. To accomplish these improvements will require the taking of private land by eminent domain. The County should disclose the precise impacts of the various alternatives and the possible mitigation options. Additionally, a rationale for considering alternatives [such as 2.2E or F] to the existing mobility element plan for upgrading West Lilac to a 2.2C standard should be shared.

B. The Covey Lane/West Lilac intersection has only partial Irrevocable Offer to Dedicate [IOD] availability that is likely inadequate for all the slope considerations of the redesign. Further, the proposed intersection redesign is complicated by the proximity of Rodriguez Road.

C. The Mountain Ridge Private Road including the Mountain Ridge/Circle R Intersection is the subject of at least three proposed alternatives all of which will require eminent domain to accomplish and one of which will take the road from private to public. The Project cites this road as a secondary ingress and egress without explanation of how ROW will be acquired except by eminent domain.

D. Rodriguez private road is also cited in the Project plans for improvement to provide alternative access. However, there is no detailed discussion of all the improvements proposed for Rodriguez Road as represented in Master Preliminary Grading Plan TM 5571 RPL 4 Sheet 7 of 12. There is also no discussion of the access rights to Rodriguez Road.

2. Phasing

The Applicant seeks the utmost in flexibility in developing the Project in five phases of which there are many possible permutations, and no assurance that the Project will perform on the Conditions of Development.

The County has endorsed this approach without any assurance of performance by the Applicant, such as bonded indemnification to ensure specific performance.

The Applicant states in the Specific Plan and the County states in the Revised Draft EIR [RDEIR] that some phases may never be built. Mitigations for traffic

impacts are tied to phased events that may never happen. This is a serious defect with the RDEIR. There is no assurance that promised mitigation will ever occur.

The Project represents that it requires no import or export of soil for all phases in total. The Project requests any possible phase implementation sequence. It is clear that Phase 3, with the largest surface area of all phases, is the net source of fill dirt for all of the other four phases and is required to be at least partially graded concurrently with the first and any other phase. The use of Phase 3 as a quarry for fill dirt for the initial phase and subsequent phases of development is not adequately addressed. Further, grading phase three in advance of development to procure fill dirt will expose the graded areas and the adjacent wetlands to erosion, an unacceptable outcome.

Phasing of the Project will apparently result in phasing of the consequent mitigation requirements but will not necessarily match the needs as they arise. For example, improvements to roads required by significant impacts will be triggered by attainment of a threshold number of residential units without regard to commercial development, which is a greater driver of traffic impacts.

Another related defect of the phasing proposal is that the sum of the traffic related analyses, for example, have analyzed fewer than 50% of the possible permutations of phase execution that the County has endorsed in the RDEIR.

The phasing strategy, as proposed by the Applicant, will have vastly different environmental impacts than those analyzed in the RDEIR. The phasing plan should be specific in terms of order and analyzed accordingly.

3. Project Objectives

The County has structured the objectives outlined in the RDEIR, in aggregate, so narrowly that only the Lilac Hills Ranch Project, as proposed by the Applicant, can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis. The VCCPG response has taken exception to the implied claims that the Project meets all of its own objectives and suggests that other alternatives to the proposed Project may fit the objectives better.

Objective One: *Develop a community within northern San Diego County in close proximity to a major transportation corridor consistent with the County's Community Development Model for a walkable pedestrian-oriented mixed-use community.*

The County has structured Objective One of the RDEIR so narrowly that only the Lilac Hills Ranch Project can fulfill this Project Objective, leading to a self-serving and biased environmental analysis.

Objective Two: *Provide a range of housing and lifestyle opportunities in a manner that encourages walking and riding bikes and that provides public services and facilities that are accessible to residents of both the community and the surrounding area.*

The Project does not meet Objective Two.

Objective Three: *Provide a variety of recreational opportunities including parks for active and passive activities, and trails available to the public that connect the residential neighborhoods to the town and neighborhood centers.*

We do not have any issues with this objective other than to state that any Project required to have a Discretionary Permit approved would have to comply with this objective.

Objective Four: *Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.*

The Project does not meet Objective Four.

Objective Five: *Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.*

We do not have any issues with this Objective other than to state that any project required to have a Discretionary Permit approved would have to comply with this objective.

Objective Six: *Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.*

The County has structured the sixth Objective of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill this Project Objective, leading to a self-serving and biased environmental analysis.

Objective Seven: *Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.*

This objective is subjective and could be met by developing the Project at General Plan densities, which would preserve existing agricultural businesses and residential-based businesses.

4. Project inconsistencies with Regional and General Plans

In comments submitted over the last two years, the Valley Center Planning Group and the Valley Center Design Review Board have challenged the proponent's assertions that this SP/GPA is consistent with the adopted County

General Plan [GP], or with Valley Center's Community Plan [CP], or with Valley Center Design Guidelines.

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

The proposed SP/GPA is inconsistent in broad and fundamental ways with the San Diego County General Plan and Community Plans of both Bonsall and Valley Center. Further, the RDEIR fails to disclose and analyze these broad and fundamental inconsistencies and their environmental consequences, as the California Environmental Quality Act [CEQA] requires. The RDEIR is derelict in concluding as it does that: "The proposed project includes a General Plan Amendment, which if approved, would result in the project being consistent with the General Plan". An Amendment to the General Plan should not mitigate the serious environmental impacts of this Project.

The RDEIR 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. The RDEIR has only a rudimentary matrix of so-called Consistency with the General Plan in appendix W. However, the serious and unbiased analysis of consistency with the General Plan and the Community Plans has not been produced.

Internal consistency is required of all County General Plans 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.

A Specific Plan is an implementation vehicle. Approval requires compliance 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. Changes of this magnitude (Land Use Policies, Mobility and Safety Elements) to the August 3, 2011 San Diego County General Plan would require revisiting the Environmental Impact of the San Diego County General Plan and likely invalidates the San Diego County General Plan EIR. Broad and fundamental amendments to adopted General and Community plans would require countywide environmental review.

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 RDEIR 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. 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.

The full text of the General Plan and Community Plan Inconsistencies comments does an exhaustive analysis of several of the General Plan and Community Plan goals and policies to reveal the inadequacies of the proposed Project and the premise being advanced to allow its approval.

5. Significant Environmental Impacts of the Proposed Project

A. **Biological Resources** – The RDEIR and Biological Resources Report cite three sensitive plant species and 13 Group 1 animal species ranging from lizards, snakes and jackrabbits to raptors, passerine birds and mule deer. It then proceeds to suggest that the loss or mitigation for these species does not represent a significant impact despite a lack of meaningful data to support that assertion.

Severe edge effects are a likely outcome for the proposed preserved habitats (largely wetlands) that will be segregated by signs and fences.

The RDEIR does not adequately account for the cumulative effects stemming from the impacts to the Project site. If we take San Diego County as the 'region' or even North San Diego County as the region, we should be looking at the historic extent of sensitive vegetation formations and wetlands within that area compared to what exists today. We should then ask to what extent have these vegetation communities been extirpated and to what extent the remaining examples of those communities have significance. Comparing proposed destruction in one project with destruction that has or will result in a handful of other much smaller projects isn't an effective measurement of cumulative effects.

B. Cultural Resources

The RDEIR and Cultural Resources Report address historic cultural sites on the Project site individually. They fail to regard the Project site overall in the context of nearby significant Native American village sites along the San Luis Rey River and its tributary, Moosa Creek. The Project site is rich with artifacts and occupation sites, but the proposed mitigation and preservation procedures appear to be piecemeal for a Project as large and transformative as this one.

The grading, by cut and fill techniques, of 4-million cubic yards of earth will jeopardize the opportunity for future study and appreciation of the basic integrity of the cultural significance of the larger area. There are suggestions in previous studies that an as yet undiscovered earlier human habitation of the Project site area, or a separate village from those already known may be present.

C. Hazards, Hazardous Materials, Wildfires

The development of the densely packed Project adjacent to agricultural areas presents the need to buffer those agricultural areas from the development and its sensitive receptors [schools, churches, senior centers, parks, homes]. However, there is no discussion of General Plan policy S-11.5, which requires development adjacent to agricultural operations in Semi-rural and Rural lands to adequately buffer agricultural areas and ensure compliance with relevant safety and codes where hazardous materials are used. The RDEIR instead chooses to address buffers against hazardous materials in the 2.4 Agricultural Resources subchapter. Perhaps it seems like more of an agricultural problem in that context than a problem caused by poorly placing an urban development in an agricultural context.

The proposed wastewater recycling facility [WRF], will not be built to coincide with the earlier phases of the Project, requiring that sewage be trucked off-site for disposal. The same trucking issue will continue after construction is complete and the WRF is operational, in order to dispose of waste solids screened from the influent. What impact would the 2-3 times weekly truckloads of sewage and/or waste solids have on the safety of residents in the Project? Other potential issues are accidental sewage or sludge spills, not to mention the impact those frequent truck trips have on the traffic flow to and from the Project.

The issues of emergency response and evacuation plans are troublesome for this Project. The Evacuation Plan does not address the most fundamental evacuation issue of the proposed Project – the limited number of roads for automobile evacuation of the 5185 residents of the proposed Project. The mobility element roads nearest the Project are West Lilac and Circle R Roads. Both roads were built as 2.2 E two-lane roads to serve a rural community with small, rural populations and the applicant plans no upgrades to these roads. The addition of 5000+ people at the Project site will severely

impact both emergency response and evacuation during a crisis event, exacerbating already congested conditions in such circumstances and putting many people at risk.

The Applicant would further impact evacuation plans by proposing 10 road standard modifications that would lower the classification of the mobility element roads in some cases, lower the design speeds of those roads and assign some mobility element road segments to the list for failing roads with no beneficial mitigation possible. With lower design speeds, narrower roadways and immitigable level of service issues, the Project will imperil evacuations from Bonsall and Valley Center to the I-15 corridor by existing residents, and impede the prospective residents of the Project at the same time. This kind of impact, played out in scenarios like Bonsall and Valley Center experienced in 2003 and 2007, would severely and significantly put hundreds of people at risk. Further, the Project has but a single evacuation route to the East. That is the easterly section of West Lilac Road that connects to Lilac Road. It is a Circulation Element 2.2 E two lane rural road. There are no plans to upgrade this road. If an evacuation event is caused by a large wildfire from the west, a panic evacuation will result over a single narrow, winding road made treacherous by the ensuing smoke plume.

The Project has not demonstrated that it can meet the 5-minute Emergency Response requirement for Fire Services. The proposed solutions of building a fourth fire station in the Deer Springs Fire Protection District [DSFPD] at the Project site do not work from the perspective of jurisdictional issues and fiscal operational cost issues. None of the existing fire stations in the DSFPD meet the 5-minute requirement for new development.

The Project is proposed for a site in a very high fire hazard severity zone [FHSZ]. Locating a Project of this size and scope in a very high FHSZ is not a smart location that is consistent with preventive land use planning. The RDEIR states that failure to meet the standard 100-foot Fuel Modification Zone [FMZ] for significant portions of the Project would be a significant impact. Section 5.4 Fuel Management Zones on page 54 of the Fire Protection Plan [FPP] states "The project includes a few areas where fuel modification zones are less than 100 feet wide." Based on even a quick scan of Figure 1.6 from Chapter 1 of the RDEIR, the more accurate and true statement is: The project proposes extensive areas where fuel management zones are less than 100 feet wide. This is a severe design flaw.

The Project appears to rely on other property owners outside the LHR Subdivision boundaries to comply with the 100-foot FMZ requirement.

The proposed Project FPP does not meet several basic requirements. None of the four fire station site options proposed meet the minimum acceptance criteria of the Deer Springs Fire Protection District (DSFPD). The Project's FPP has compliance issues with the DSFPD Ordinance No. 2010-01, the County of San Diego Consolidated Fire Code, and the County of San Diego

Public and Private Road Standards. The FPP focuses nearly exclusively on Wildfire Management and does not sufficiently address either Structure Fires or Emergency Medical Service (EMS). The FPP doesn't adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads.

Thus, the proposal amounts to putting a large project with several vulnerable populations into a very high fire hazard severity zone with substandard fuel modification zones and depending on more rigorous construction techniques to restore a margin of fire safety. The question becomes why the applicant has not redesigned the Project to allow for standard FMZs throughout the Project? This problem is strained further by uncertain access to the Project site by fire apparatus. That access depends on at least two private roads, for which easement access is uncertain, and the applicant's proposal to gate those access points. These constraints on access are problematic for fire safety and evacuation efficiency.

D. Significant Irreversible Environmental Changes Resultant From Project Implementation

The proposed Project will cause significant, irreversible, and, in most instances, immitigable impacts to the Project site, to the Valley Center and Bonsall communities and their community plans and to the County of San Diego and its General Plan. The Project will require amendments to the General Plan, its principles, policies, and regional land use designations and to the Bonsall and Valley Center Community Plans, or, at least, a severely disfigured interpretation of all of them. Why would the County risk upsetting the entire General Plan, not to mention the Community Plans, by acceding to the wishes of the developer to amend those plans to suit this Project?

The RDEIR focuses on the grading of the Project site, on the use of fuels [energy] to prepare the Project site and manufacture construction materials, on the consumption of construction materials [wood, concrete, asphalt, drywall, etc.], on subsequent energy and natural resource consumption by the eventual residents, and on the amount of time to construct the project. If the County needed the additional equivalent dwelling units [EDU] to meet housing goals for build-out of the General Plan, such expenditures of energy and materials would be more understandable. But, since the additional EDUs are not needed, why would the County approve of what amounts to a waste of resources?

The movement of over 4-million cubic yards of dirt and rock on the Project site is perhaps the most obvious irreversible impact. Another is the loss of hundreds of acres of productive agricultural land for future production. Another is the loss of significant amounts of biological habitat and the flora and fauna that presently occupy them. The RDEIR does not adequately

address the cumulative impact of scores of such individual losses caused by multiple projects within the County and the irreversible loss of the majority of native habitats in the aggregation of those individual losses. Why are such losses necessary when alternatives that have dramatically less environmental impact are available to achieve the Project's myopic objectives?

Less obvious losses are the changes to the General Plan and related Community Plans that will be required for this Project to be approved. Those changes will dramatically alter the parameters of the General Plan that strive for smart growth. And, if the Project is approved, it will set a precedent that will have severe ramifications across the unincorporated countryside of San Diego County.

E. Water Quality/Hydrology

Off-site routes for recycled water and sewer pipelines have been found to lack sufficient legal right-of-way easements as represented in figure 3.1-8, "Off-site Sewer Collection System." This finding makes construction of sewer and recycled water pipelines for the Project problematic.

Use of the Lower Moosa Water Reclamation Facility [LMWRF] for a series of alternative sewage solutions has been proposed. The LMWRF was built in 1974 and provides disinfected secondary treatment of reclaimed water only. It has been approved by two agencies to double the LMWRF capacity to 1.0 million gallons/day [MGD] of influent. That capacity is not presently added.

If eventually expanded, likely it would be required to upgrade its treatment to tertiary standards to allow beneficial use of the recycled water on landscaping and golf courses and to prevent degrading the water quality of the San Luis Rey Basin watershed. Current capacity of the LMWRF is 0.5 MGD and it is currently averaging 0.35 MGD of influent. The present ground water percolation pond capacity is 0.44 MGD. At present capacities, LMWRF could accept a maximum of 450 additional equivalent dwelling units [EDU]. However there is some question whether the capacity of the percolation ponds would be allowed to reach the 0.44 MGD limit. Several already pending permit applications, which could reduce the 450 additional EDUs, further complicate matters. Delays for permitting and construction could make the capacity improvements unavailable for some time. Another factor is the limited available space at LMWRF for the expansion.

Analysis of tabular data from the Waste Water Management of Alternatives Study [table 5-1] calls into question the availability of adequate acreage to discharge recycled water beneficially on-site.

It appears that the Hydro Modification Design is relying on exaggerated assumptions for both rainwater harvesting success and the availability of

residential landscape areas as permeable surfaces for absorption of water. That same design also reveals the desire to install 23 acres of private roads paved with permeable pavers to permit additional percolation of water into the soil. Such roads may fail under the weight of a Type 1 fire engine.

It is tortured logic to argue that taking green field agricultural and semi rural estate land and introducing a dense urban environment that develops 504 of the 608 acres, adding 83 acres of road and 68 acres of manufactured slopes is consistent with General Plan policy COS-5.2 which requires development to minimize the use of impervious surfaces.

E. Geology and Supplemental Geology Report

The review identifies questions regarding the need for blasting for cuts that exceed 50-feet in depth to facilitate the movement of over 4-Million cubic yards of dirt and rock. Given the phasing of the project, Silicates will be a potential hazard relative to the AQMD standards for a period of as much as 10-years or even longer.

Slope Stability and Remediation describe cut slopes (6.2.1) and fill (manufactured slopes 6.2.2) in excess of seventy-feet (70-feet) in height. There are no seventy-foot high manufactured slopes existing in this community, which makes these proposed slopes out of character with the community.

6. Project Alternatives

The County's Project Alternatives Analysis in the RDEIR is grossly defective in meeting CEQA requirements in five areas that are summarized below:

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

The General Plan alternative must be properly considered by the applicants and the County, rather than focus their attention strictly within the boundaries of the

Project. Apart from the time and money already spent developing the General Plan [12 years and \$18.6 million], it was designed as a plan for the entirety of the County's unincorporated area while being mindful of the incorporated cities as well. The Lilac Hills Ranch Project is only a single piece of a much larger puzzle.

To study this "puzzle piece" is not to study the General Plan alternative. This "half-study" misses the underlying logic of the new County General Plan which is, according to the lengthy introduction to the GP, to achieve "sustainable development" with a two-part strategy called Smart Growth.

I. Part One: Direct new growth to areas where infrastructure already exists (such as the established Village in Valley Center's central valley.

II. Part Two: Retain agriculture and large parcels for functioning rural lands that clean the air, provide vital watersheds, and support diverse forms of wildlife among other functions.

The plan works only when its two interdependent parts work together.

The Lilac Hills Ranch Project undermines both aspects of this strategy. The General Plan alternative implements both aspects of this strategy. The only acceptable "study" of the General Plan Alternative is to study it in its entirety.

7. Specific Plan

The comments on the Specific Plan include several major concerns:

A. The Lilac Hills Ranch Project [the Project] is too large and too dense for Valley Center and Bonsall and it is improperly located. Urban densities are incompatible with the rural, agricultural location in which the Project has been sited.

B. Roads and Traffic. The road standard modifications proposed by the Project will downgrade the classification of a mobility element road [West Lilac Road] and will lower the design speeds of several road segments, both public and private. At the same time the Project will add over 5000 people and approximately 20,000 average daily trips to those narrower, slower roads causing congestion and road failure. Several Mobility Element Road segments associated with the Project will be allowed to sink to LOS E/F without mitigation because there wouldn't be commensurate benefit realized by adding lanes.

C. Compliance with the General Plan. The Project's Specific Plan threatens to overturn virtually every element in the County's new General Plan adopted in 2011 after 12 years of discussion, compromise and community involvement, over \$18 million in government expenditures and

countless hours of effort on the part of local citizens. Approval of this Project will require damaging amendments to the General Plan and the Valley Center and Bonsall Community Plans that will be growth inducing, particularly in the western portion of Valley Center. If this Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the principles and policies of the General Plan and Community Plans. In the context of this Project, it is unclear that the General Plan is anything more than a placeholder until the next change is proposed.

D. Services and Infrastructure - Water, Schools, Fire, Wastewater Treatment— Infrastructure is expensive. Putting in new roads, adding additional lanes to a bridge, building a fire station, putting up a new school, installing sewer and waste treatment plants and building trails all cost large amounts of money. A principal reason why the General Plan Update strongly favors “compact, town center developments,” while stating that it intends to limit “growth in areas without adequate roads, water and sewer service,” is because of the demands on the public purse for building and then maintaining these infrastructure items over and over.

The Project is seeking to build a city the size of Del Mar, CA that will require an almost entirely new infrastructure—new roads, schools, sewer systems and a broad range of other infrastructure items. These infrastructure expansions are why the Valley Center Community Plan designates the North and South villages at the core of Valley Center for such housing and commercial densities. The Community Development Model also directs that kind of concentration of density and infrastructure not at the outer edge of the community as this Project proposes, but at the Valley Center core.

E. LEED-ND/Sustainable and Walkable Community. This Project still has not meaningfully addressed the requirements for LEED-ND development, although it continues to be described as “designed to meet the standards of the LEED-ND or an equivalent program.” There is no equivalent program cited and the Project fails to meet any of the site location and linkage requirements listed in the LEED-ND pre-requisites and standards.

The Project also cites its consistency with the Guiding Principles and the Community Development Model in the General Plan for San Diego County. However, even a cursory examination of those principles and the model show that, rather than being consistent, the Project is conversely inconsistent with both the Guiding Principles and Community Development Model. The ‘community’ that needs to be addressed is the Valley Center community, and the Project should be understood as an element of that community. The General Plan presently applies the Community Development Model to the Valley Center community and the

zoning and land use patterns within Valley Center are consistent with that model. The same is true for the Bonsall community. The proposed addition of the LHR Project in the western portion of the Valley Center community flouts the intention of the Community Development Model by establishing high-density development away from the community center, away from needed infrastructure, and in a designated agricultural area. The Project is leapfrog development and it does not qualify as a LEED-ND community under any reasonable interpretation of those standards.

F. Agriculture— The General Plan Update of 2011 has set aside the area where The Project would be built as a place for agriculture and other rural and semi rural uses. In contrast to the claims made by the Project applicants, the area is not characterized by historical agricultural activity. It is a present-day agricultural area with a long, continuous history of agriculture. Avocado, citrus, cactus commercial nurseries and other farm operations are located in and around the Project areas. These agricultural uses attract insect and fungal infestations, which mean that aerial spraying is often necessary. Spraying could pose a danger to sensitive individuals living in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building the Project at the planned site would greatly damage many currently productive and successful agricultural businesses.

G. Twists of meaning and lack of clarity in the plan. One of the most difficult aspects of the Project's Specific Plan is the extent to which it makes misleading claims. They would have us believe that they are building a LEED-ND or equivalent development even though The Project violates nearly all LEED-ND standards for site selection and linkage; that adding 5,000 residents to a rural, agricultural area actually improves traffic over narrow, winding rural roads; that grading and moving 4-million cubic yards of earth (enough to build a path 4-feet wide around the equator of Earth) preserves natural resources and habitat for animals.

In addition, after criticizing four previous iterations of the Specific Plan, this version continues to use conditional and indefinite language to describe aspects of the Project that should be, at this stage, unconditional and definite. It seems as if the applicants want us to review and approve a suggestion, or a concept rather than a specific plan that defines their intentions.

There are many other concerns addressed in the Specific Plan comment document. They range from the size and type of parks in the Project to the Fire Protection Plan, from the Water Reclamation Facility to open space and conservation policies, from D special area regulations to circulation elements.

There are too many to reasonably relate in this summary. An indication of the severity of impact this Project has on the project site is provided by the sheer volume of significant impacts, mitigable or not, listed in the table S-1 of the RDEIR Executive Summary, *Summary Of Significant Effects And Mitigation Measures To Reduce The Effects*. A project, plagued by so many issues that will have such a drastic impact on the communities of Valley Center and Bonsall, not to mention the region of north San Diego County, should not proceed any farther toward approval.

Attachment Page 116

From: [Peter StClair](#)
To: [Fitzpatrick, Lisa](#); [Slovick, Mark](#)
Subject: Lilac Hills Ranch
Date: Wednesday, July 01, 2015 12:07:58 PM

Please pass my comments on to the Planning Commissioners when they schedule a hearing on the Lilac Hills Ranch project in Valley Center/Bonsall.

Dear friends,

In August, 2013 I commented on the original Lilac Hills EIR. Nothing in the Revised EIR changes my opinion: this is neither a village, nor a sustainable project as claimed by the developer. It should be rejected. There appear to be project alternatives outlined in the REIR that might pass muster in a future submittal.

1. In its first phases and in the majority of its development Lilac Hills Ranch is a traditional 4,000 to 5,000 sq. ft. lot single family detached subdivision.

Unfortunately, it is on a substandard road, lacks alternative ingress and egress, and is 10 miles distant from any "urban" center.

2. This project will be highly dependent on cars and trucks.

It is highly unlikely the neighborhood commercial facilities can be economically successful while containing traffic within the project. A large number of customers will come from outside the project, further burdening the very inferior access road(s).

Even if stores could survive, they are distant from the majority of Lilac Hills' own single family units and most residents are still likely drive to do anything.

3. The County has just adopted its General Plan. Projects like this were considered under the old plan, rejected, and the new General Plan clearly outlined how large-scale projects might move forward in the future.

This project does not comply. In any way, shape or form.

4. While the project environmental impacts are not considerable (the land to be developed is in large lot single family homes and limited agriculture), the proposed project is not the best alternative. In fact, it is not even feasible given the wholesale inadequacy of infrastructure and the poverty of design.

However, any alternative with a greater number of units than allowed under the current zoning will require ingress and egress beyond the capacity of the existing roadways--one of which is a private street (Mountain View), and the other a country lane (Covey).

5. There is the crux of the problem: if sufficient infrastructure is built to handle a project with more housing than allowed under the General Plan and zoning, it is going to be growth inducing in an area that is largely rural.

That is inconsistent with the new General Plan which directs significant development to existing centers.

Attachment Page 117

I see no way out of this problem other than to reduce the project's intensity significantly.

As submitted, this is a standard urban/suburban subdivision masquerading as something different.

--This project is not a village---there are few if any characteristics of a village--walkable, services on site, compact, a variety of land uses, creation of jobs, institutional uses as well as residential and commercial.

The project proponent's San Elijo Hills is closer to being a village. It is also three times the size and much closer to dense urban development in San Marcos and Carlsbad.

Indeed any sense of a village at Lilac Hills is deferred to future phases. The senior housing component is a chimera. I fear the developer will appear in front of you ten years down the line and ask for a rezone to single family subdivision. I do not know of a single senior complex this large located this far from any medical services, a hospital, or significantly higher nearby residential and commercial density. It is flatly uneconomic and if this project is indeed not growth inducing--will remain so into the future.

What is proposed to be built is a very large subdivision on a very narrow road.

--The project is not "sustainable". Sustainable means a projects needs are balanced within.

This project might be a good place to live, albeit it difficult to drive to and probably in danger of wildfire.

Creating additional housing in our supply constrained county is a good idea.

Its just that our General Plan calls for dense housing (and this project is dense even by suburban standards) to be elsewhere.

Peter H. StClair
2341 Whitman Street
San Diego CA 92103
619-260-1307

Attachment Page 118

June 4, 2015

Chairman Brian Woods
Chairman of the Planning Commission
County of San Diego
5510 Overland Avenue Suite 110
San Diego, CA

Re: Lilac Hills Ranch General Plan Amendment (GPA) PDS2012-3800-12-001

Dear Chairman Woods:

Shortly the Lilac Hills Ranch GPA will be heard by the Planning Commission.

The Applicant has spent the past five years lobbying and sending marketing messages to the Director of Planning and Development Services, Planning Commission and Board of Supervisors extolling the alleged virtues of the Project.

The General Plan already provides "by right" 2100 units in neighboring Bonsall, 6400 in Valley Center, 6800 in Fallbrook, and 2000 in Hidden Meadows.

Fewer than 2000 units have been issued permits in the entire Unincorporated County since 2010. Demand doesn't support additional Residential Housing in these rural areas.

This project has been "promoted" as providing affordable single family residential housing in the \$ 500 thousand range.

Current projects in the Valley Center South Village are targeted in the \$ 300 to \$ 400 thousand range for single family residential units comparable to Lilac Hills Ranch.

Lilac Hills Ranch can't deliver on affordable housing, because the project doesn't have existing infrastructure to safely support urban development in the proposed rural location.

In the past five years, the Applicant has not made any progress on providing the required Infrastructure for the Project. The Applicant is requesting Exceptions to Road Standards that compromise Safety.

The Project has made no progress in obtaining Legal Rights for using existing Private Roads for Proposed Secondary Access Roads, and will require a total of 39 acts of taking of Private Land for offsite improvements, destroying 3 existing homes.

Attachment Page 119

Commission Chairman Woods

June 4, 2015

Page 2

The project is trying to sell a Traffic Impact Study that an Independent Traffic Engineer has found to have understated the Traffic volume and Traffic impacts. The Independent Engineer, SANDAG, Caltrans, and the City of San Marcos have noted that the Project as proposed does not fairly mitigate the Project's direct Traffic Impacts.

The Project increases Public Road traffic volume to **15 times General Plan 2030 levels**. The meager improvements offered on existing Public Roads adds no new travel lanes, and amounts to a small fraction of the total improvements that are required for road safety for the increased traffic loads.

The project is in CALFIRE High and Very High Fire Severity Zones. The Project's current Fire and Emergency Response Times do not meet the General Plan 5 Minute Response standard.

There is only one Evacuation Route to the East and one to the West from the Project. The Project proposes increasing the area's resident population by **5200 -- more than ten times the General Plan**. The Project is not proposing correcting this fundamental design flaw by adding additional Evacuation routes.

This Project cannot be **safely** built in this location without proper Infrastructure.

This attached briefing material concisely documents the assertions made in this letter.

This Project, if approved, presents **significant risks to Public Safety**.

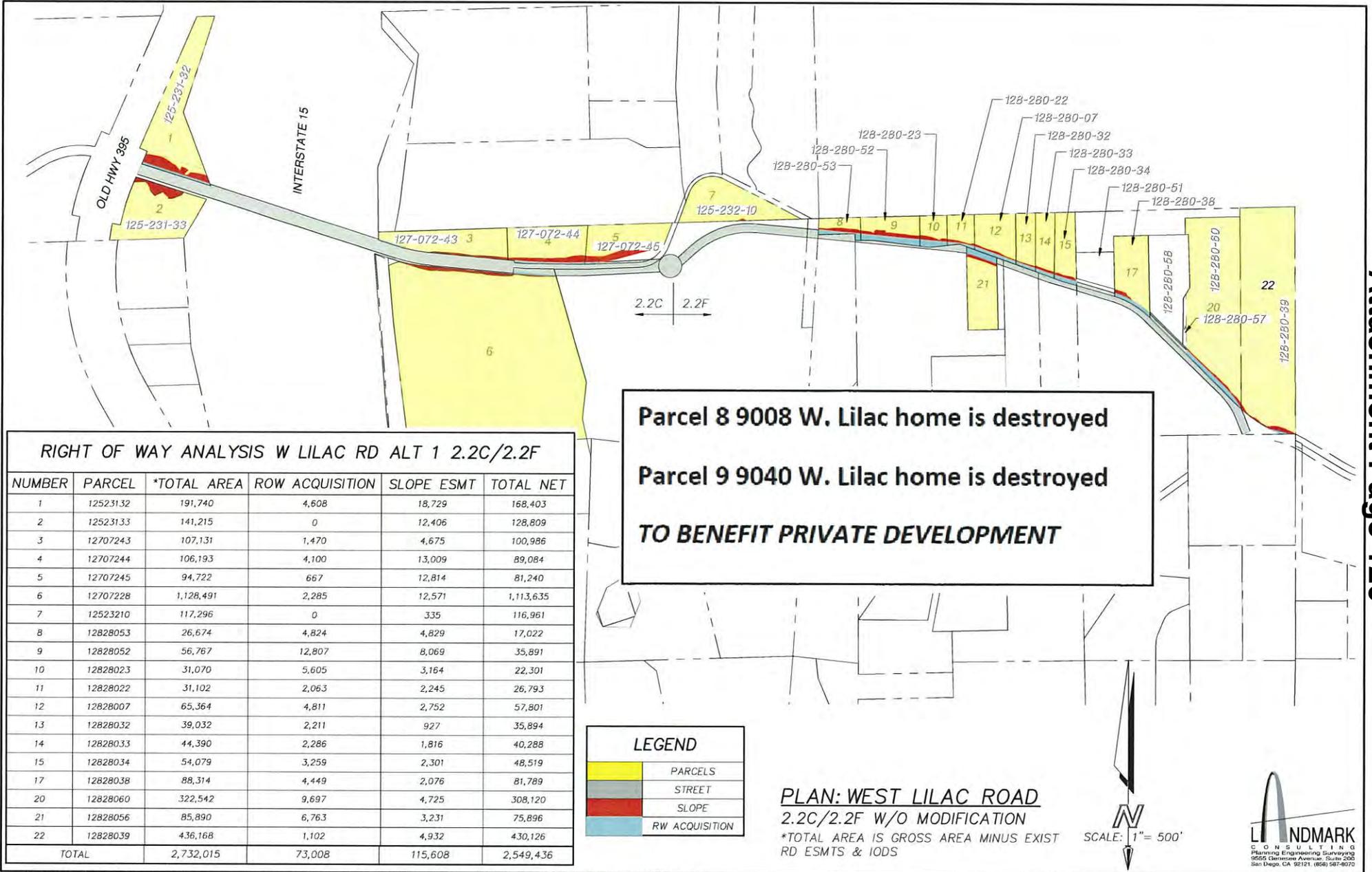
I welcome any opportunity to discuss this further with you.

Sincerely,



Mark Jackson
9550 Covey Lane
Escondido, CA 92026

CC:
Planning Commissioners
County Counsel Paul Mehnert



Parcel 8 9008 W. Lilac home is destroyed
Parcel 9 9040 W. Lilac home is destroyed
TO BENEFIT PRIVATE DEVELOPMENT

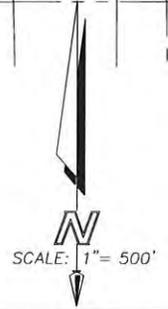
RIGHT OF WAY ANALYSIS W LILAC RD ALT 1 2.2C/2.2F

NUMBER	PARCEL	*TOTAL AREA	ROW ACQUISITION	SLOPE ESMT	TOTAL NET
1	12523132	191,740	4,608	18,729	168,403
2	12523133	141,215	0	12,406	128,809
3	12707243	107,131	1,470	4,675	100,986
4	12707244	106,193	4,100	13,009	89,084
5	12707245	94,722	667	12,814	81,240
6	12707228	1,128,491	2,285	12,571	1,113,635
7	12523210	117,296	0	335	116,961
8	12828053	26,674	4,824	4,829	17,022
9	12828052	56,767	12,807	8,069	35,891
10	12828023	31,070	5,605	3,164	22,301
11	12828022	31,102	2,063	2,245	26,793
12	12828007	65,364	4,811	2,752	57,801
13	12828032	39,032	2,211	927	35,894
14	12828033	44,390	2,286	1,816	40,288
15	12828034	54,079	3,259	2,301	48,519
17	12828038	88,314	4,449	2,076	81,789
20	12828060	322,542	9,697	4,725	308,120
21	12828056	85,890	6,763	3,231	75,896
22	12828039	436,168	1,102	4,932	430,126
TOTAL		2,732,015	73,008	115,608	2,549,436

LEGEND

	PARCELS
	STREET
	SLOPE
	RW ACQUISITION

PLAN: WEST LILAC ROAD
2.2C/2.2F W/O MODIFICATION
 *TOTAL AREA IS GROSS AREA MINUS EXIST
 RD ESMTS & IODS

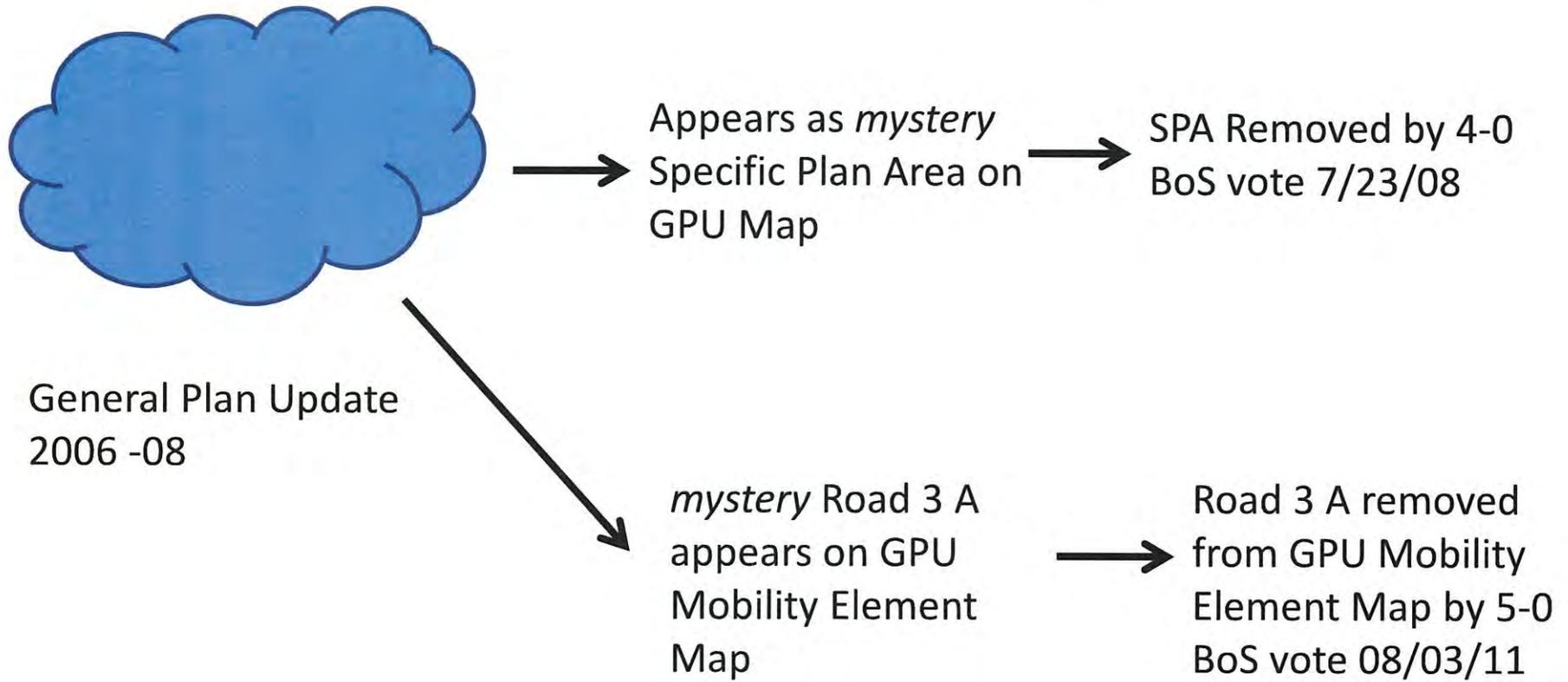


Dwg. f:\dropbox\103-7\drawings\alignment studies\w lilac rd - alignment studies 2.2f, 2.2c and air alt\103-7 air alt 2.2f 52rw ult width impacts parcels.dwg Plot d: 10/17/2013 10:30:39 AM

Facts regarding the proposed Lilac Hills Ranch GPA PDS2012-3800-12-001



The Project began with mysterious County documents during 2006-08



Plan Amendment Authorization approved by Planning Commission 4-2-1 on 12/17/2010

- Issues identified:
 - Inadequate Project Definition
 - Legal Rights for use of Private Roads by Project
 - Did not have Rights for offsite improvements (Roads, Sewer pipelines)
 - Compliance with Fire & EMS 5 minute response time
 - Other infrastructure (Traffic, Sewers, Schools) inadequately defined
 - Inconsistent with current or proposed General Plan(s) and Community Plans
 - Agriculture, Biology, Noise (and so on)
- The PAA was “rationalized” as allowing the Project to proceed and address the issues identified

The First Draft Environmental Impact Review was released for Public Comment on 7/3/13

- More Issues identified (in addition to PAA issues):
 - Understated Traffic Impacts
 - **TEN Required Exceptions to County Road Standards**
 - Needs Eminent Domain for Road and Sewer R-O-W
 - Not meeting Fire & EMS 5 minute response time
 - Other infrastructure (Traffic, Sewers, Schools) inadequate
 - Inconsistency with Gen Plan and Community Plan
 - Agriculture, Biology, Noise (and so on)
- The DEIR received 2,500 pages of Public Comments in Opposition

A Revised DEIR was required and released for Public Comment on 6/12/14 to 7/28/14

- The initial DEIR was deficient in fairly disclosing Environmental Impact – **revision cycle necessary**
- More Issues identified (in addition to 2013 DEIR issues):
 - **CALTRANS, San Marcos, and SANDAG letters** – traffic understated or not mitigated
 - **Required** Exceptions to County Road Standards
 - **Documented requirements** Eminent Domain for Road and Sewer ROW
 - **Still** Not meeting Fire & EMS 5 minute response time
 - Other infrastructure (Traffic, Sewers, Schools) inadequate **definition and disclosure of impacts**
 - **Inconsistency with Gen Plan** and Community Plan
 - Agriculture, Biology, Noise (and so on)
- **No Responses to 7/3/13 DEIR Public Comments Received**
- The RDEIR received 3,500 pages of Public Comments in Opposition
 - Six legal firms provided comments in opposition to the Project

June, 2015 Status

- No Responses to Comments yet received for either 2013 DEIR or 2014 RDEIR
- Difficulty in obtaining scheduling information
 - Future Planning Commission, Board of Supervisors reviews
- County requested Bonsall and Valley Center Planning Group formal votes on Project
 - “Drama” at Bonsall April 2015 meeting resulted in continuance until May 5th, voted 4-0 to deny
 - “Drama” and 4/13/15 Valley Center voted 11-2 to deny
- **Accretive statements on Project in Bonsall and Valley Center hearings diverge from documented facts**

Lilac Hills Ranch is not Needed

- General Plan provides 72,683 **MORE AFFORDABLE** new units in the unincorporated County, near **EXISTING INFRASTRUCTURE**
- GP capacity for new homes exceeds SANDAG's projections.
- 29,533 of these are planned for North County.
 - 2138 units in Bonsall;
 - 6773 units in Fallbrook, 1878 units in the approved "new village" at routes I-15&76;
 - 1982 units in Hidden Meadows where no building permits have been requested
 - 9660 units in North Metro (unrepresented area);
 - 2008 units in Pala-Pauma.
 - 598 units in Twin Oaks;
 - 6371 units in Valley Center;
 - 4179 units in San Dieguito;
- Demand is far behind. **Fewer than 2000 permits** have been issued **since 2010**.

Build where it's SAFE and AFFORDABLE – NOT HERE!

The Project violates COUNTYWIDE and REGIONAL Plans creating valid legal issues

- Doesn't meet 2011 General Plan Policies
 - LU-1.2 Leapfrog Development + Community Plans
 - 5 minute Fire and EMS response
- County Climate Action Plan (GHG/AB32)
 - Now invalidated; this automobile based Project increases GHG
- SANDAG 2050 Regional Transportation Plan
 - Project *increases* CHG (*see SANDAG 7/28/14*) and is not in a Smart Growth area

ALL of the County is impacted

In addition to the Program Level General Plan Issues, the Project itself has many Issues

1. Lacks legal rights for offsite improvements
2. Requests 10 exceptions to DPW Road Standards. Does not have legal rights to use private secondary access roads for the Project's purposes
3. No agreement on 5 minute Fire & EMS service
4. Unsafe Traffic Impacts and has not adequately mitigated even the identified and disclosed impacts
5. Uses more potable water than current land uses

And has not properly disclosed Agriculture, Biological, Evacuation, Noise, Sewer and Recycled Water, Climate/GHG, Energy, Schools, Growth Inducement, Wetlands, and Project Alternatives Impacts and Mitigation

Lacks Legal Right of Way for Offsite Improvements

Accretive states: “The project will not require right-of-way from any adjoining property owners.”

The Facts:

1). County road standards require improvements to W. Lilac (public), Covey and Mountain Ridge Rd (private)

39 parcels require taking.

3 residences destroyed on W. Lilac and Mountain Ridge.

Policy J-33 prohibits this (*see map and next chart photo*).

2). Sewer and Recycled Water – Water District does not have rights for the only economically feasible route.

VCMWD states “*additional rights will have to be obtained from existing property owners*” (*see 7/8/13 ltr*)

- West Lilac Map showing 22 parcel incursions + 2 houses that will be destroyed
 - Full size 11x17 map attached as separate file
“Chart 11 Insert - 11 x 17 Map of 22 takings of private land”

Required destruction of 2 homes on West Lilac Road



10 Road Standard Exemption Requests and Lack of Legal Rights to use Private Roads for Project's purposes

Accretive states: "Lilac Hills Ranch is committed to safety."

The Facts – Build Roads Cheap and Unsafe:

- 1). Project requests 10 exemptions including two blind intersections. Improvements require Eminent Domain (ED)
- 2). The Project requires ED for the Covey Lane/West Lilac access point
- 3). Mountain Ridge requires either an unsafe road design (not meeting Fire Code) or ED .

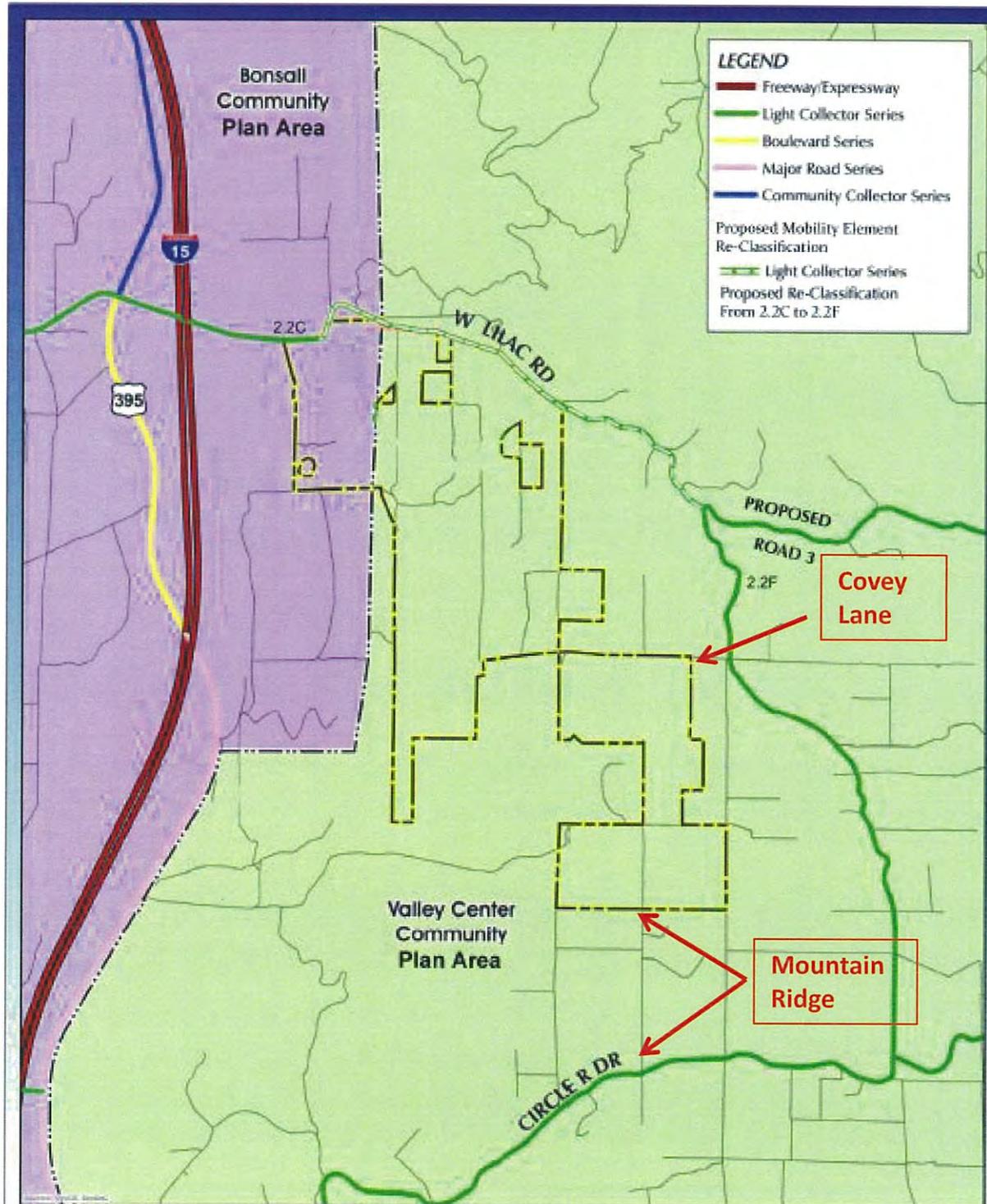
Blind Intersection

- Requires land takings at Covey Lane

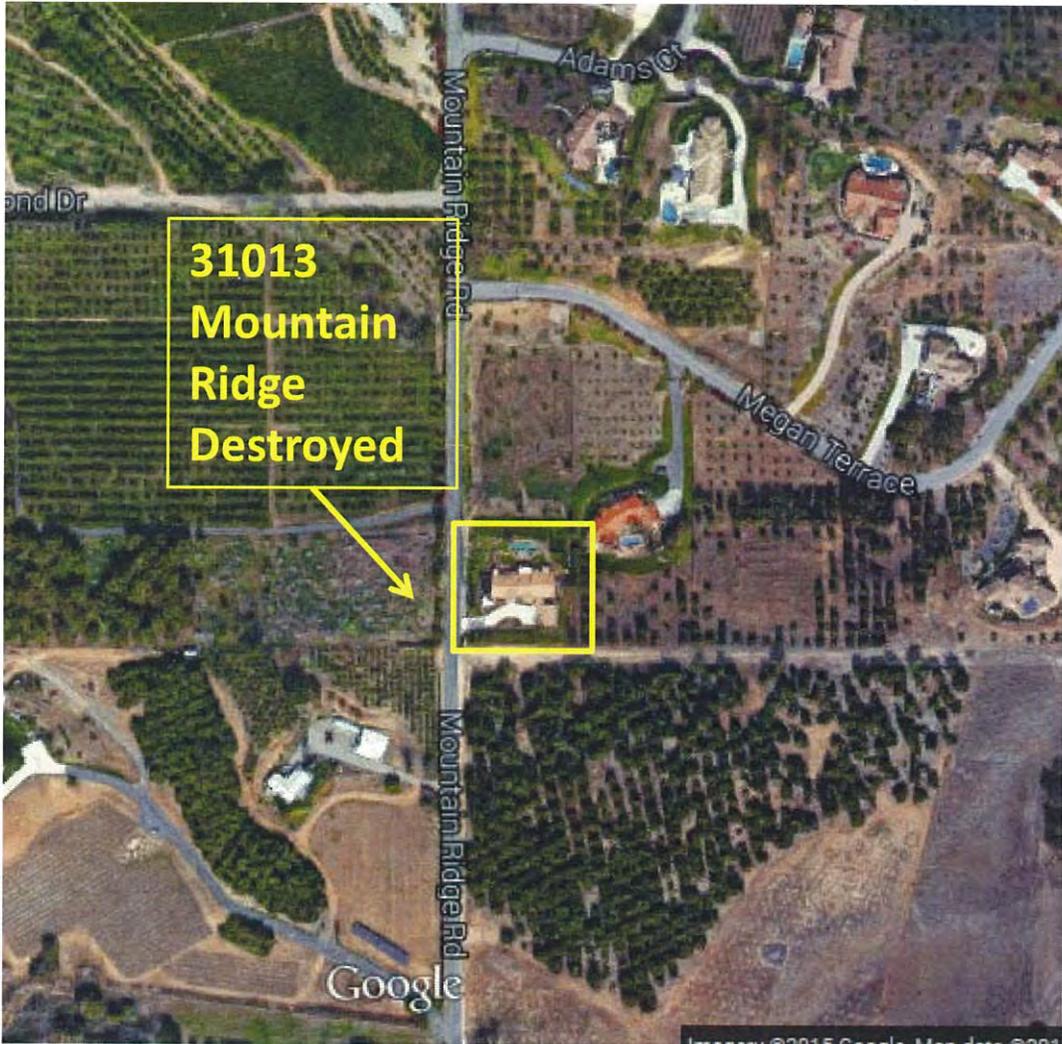
Mountain Ridge

Minimum Private Road Standards

- Requires taking of 8 parcels
- **Destroys residence at 31013 Mountain Ridge**



Required destruction 31013 Mountain Ridge



10 Road Standard Exemption Requests and Lack of
Legal Rights to use Private Roads (*continued*)

The Facts (*continued*) :

4) THE PROJECT HAS INSUFFICIENT RIGHTS TO USE
COVEY LANE AND MOUNTAIN RIDGE FOR THE PROJECT'S
INTENDED USES.

County Counsel has been informed beginning in 2013 of Accretive's
limited rights to use Covey Lane and Mountain Ridge Private Roads
.

**Project approval may create Civil liability for the
County – obtain a personal opinion from County
Counsel Mehnert**

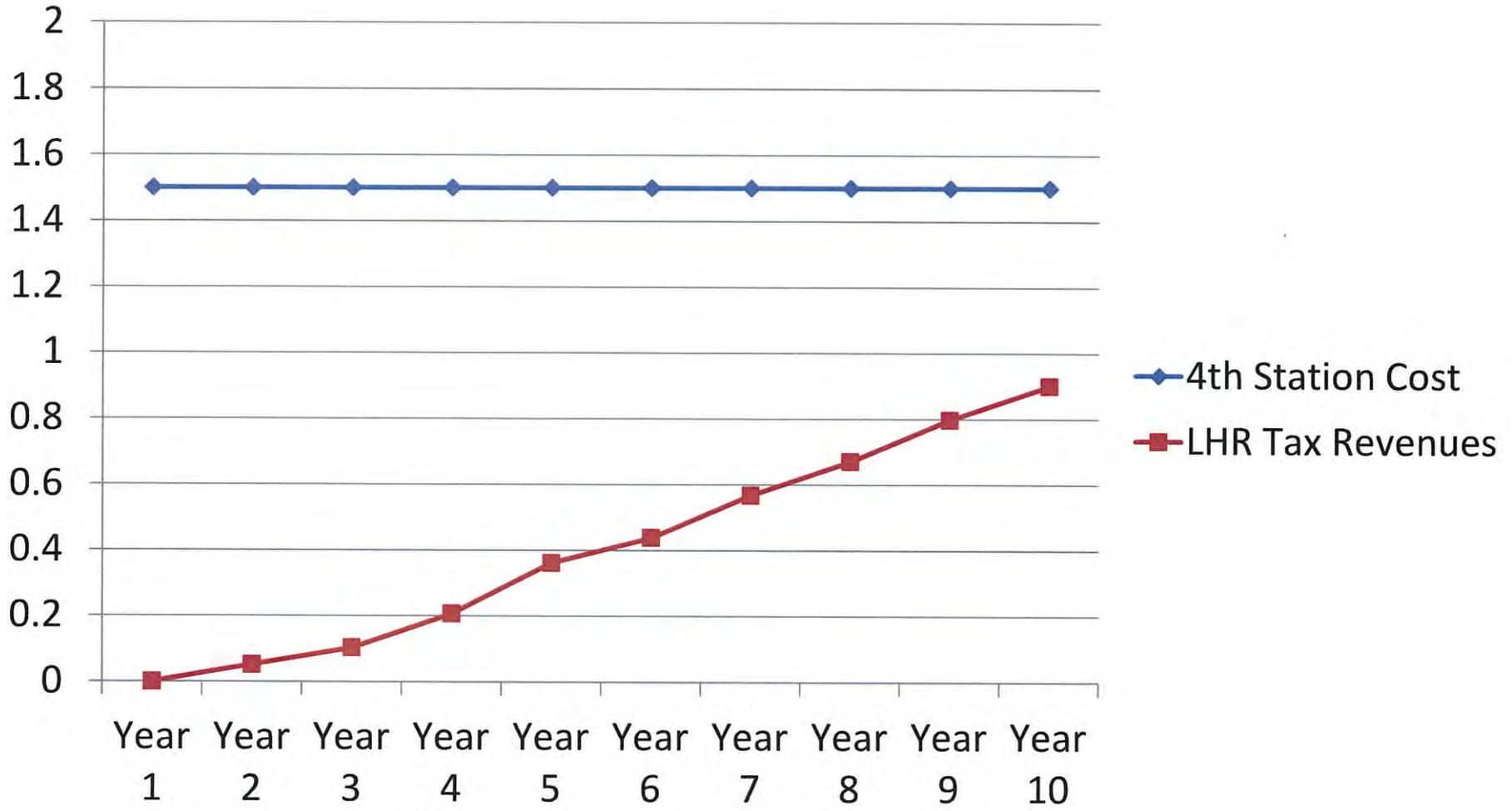
No Agreement with Deer Springs Fire Protection District (DSFPD) on providing 5 minute Fire and EMS Service

Accretive states: “The District has issued a Facility Availability Letter and has stated that the District has the capacity and capability to serve the community.”

The Facts:

- 1). DSFPD can only meet 7-9 minute response times without adding a fourth DSFPD station.
- 2). A fourth station will have initial capital costs. Additionally, and more significantly, **at build out** additional tax revenue only pays for **60%** of the annual operating cost of the additional station.

\$ 10 M over 10 Year Revenue Shortfall DSFPD on providing 5 minute Fire and EMS Service with 4th Lilac Hills Ranch station
 (annual operation costs in \$ Millions constant 2013)



Unsafe Traffic Impacts and inadequate Traffic Impact Mitigation

The Facts:

1). The Project Traffic Report projects 19,428 Average Daily Trips (ADT). An independent Traffic Engineer using SANDAG standards evaluated 21,744 ADT or 12% higher traffic.

*The Traffic loads are **too high** for the road network to **safely** transport*

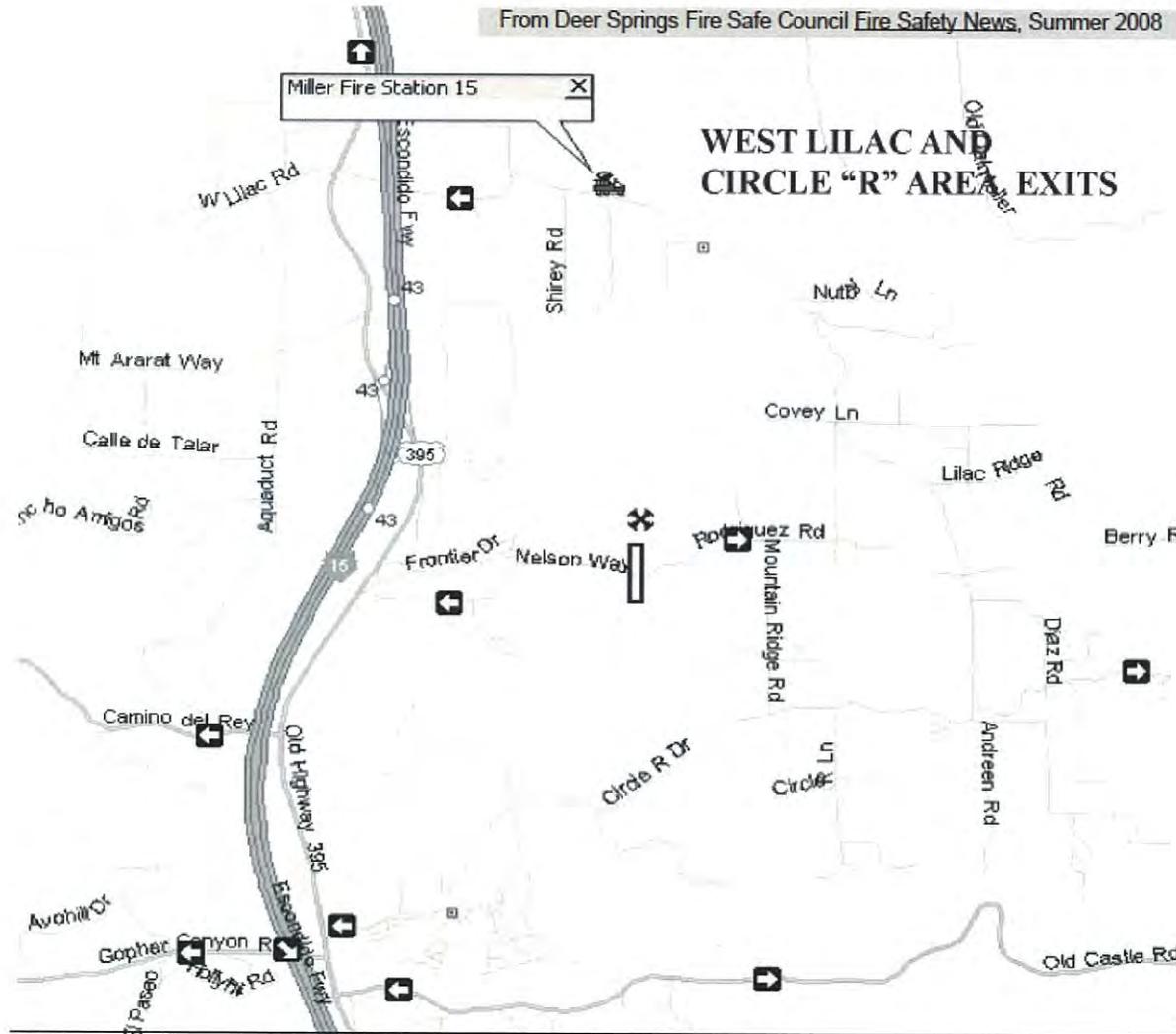
2). Even at the 19,428 ADT load, Caltrans, SANDAG, the Independent Traffic Engineer, and the City of San Marcos commented that **mitigation is inadequate**

Unsafe Traffic Impacts and inadequate Traffic Impact
Mitigation *(continued)*

The Facts (continued):

- 3). The unmitigated traffic loads combined with one easterly exit and one westerly exit on Public Roads **create a future potential County Liability** in this high Wildfire risk area
- 4) The Project requests 10 Road Standard Exemptions, **further lowering Public Safety**

One Way out East, One way out West – all on inadequate Public Roads



The only Westerly Evacuation Route for 5200 new residents = Unbounded County Liability



The Project will use more Potable Water than the current land uses for the Project

Accretive states: “the community will use less water, when it is completed, than the property currently uses today.”

The Facts:

1. Standard industry methods estimate the Project will increase water use from 513 to 1290 acre-feet per year; developer claims there will be no net gain.
2. Center for Biological Diversity shows the developer’s lowball estimate is based on inaccurate assumptions about the availability of recycled water and an arbitrary “conservation reduction” of 25%.
3. Moosa sewage plant cannot treat to recyclable standards and there is no funded upgrade to do so.

The Project does not provide **SAFE** Infrastructure for the density requested

- Please review this briefing with your Supervisor and their Land Use Aide prior to the Public Hearing
- There are very real **SAFETY** issues that result in future **LIABILITY** issues for the County
- Please ask County Counsel Mehnert for his personal opinion regarding any County potential Liability issues raised in this briefing prior to the Public Hearing

Attachment Page 145

From: [Ray Ewing](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 3:32:18 PM

To the San Diego County Planning Commissioners:

I am writing to request the denial of the Lilac Hills Ranch project for one very important reason. The issue is with the safe evacuation of the area residents in the event of a wildfire. While I recognize that you will certainly receive many emails and letters that will talk about and cite the many failings of this development at many levels and the lack of community support, my concern is with an issue not addressed and one that does not have standards in place.

I'm sure that you recognize that the Lilac triangle is a pocket on a plateau with only three roads in/out of it. While we have always expected the Santa Ana winds from the east to carry a wildfire westerly, last year (May, 2014), we experienced a wildfire traveling from west to east. During a partial evacuation, the Lilac Bridge over I-15 became congested/blocked for almost two hours. The bottleneck forced the residents to go out the only two other routes. The only easterly route out, Lilac Rd., is narrow and winding, and in fact, they are so narrow with tight corners that school buses are restricted from utilizing that portion of Lilac.

My point is this. Please take the time to drive the area (just Circle R and Lilac (east of I-15 to Castle Creek), note the numerous High Fire Risk signs, narrow roads, tight corners, lack of guard rails and the lack of turn outs. Please also note the thousand of acres of natural vegetation, avocado and citrus trees, many now dying or dead due to the drought, which you might want to think of as 'fuel'. Now imagine a fast easterly traveling wildfire in Bonsall crossing over I-15 and Old 395 (or the same with a Santa Ana driven wildfire), that necessitates the evacuation of the 5,000+ residents of Lilac Hills Ranch plus the proposed 200 bed senior care facility in the LHR development plus the existing local residents in the Lilac triangle. Now also add the emergency vehicles that will be traveling on the roads and may be going against the evacuation traffic. Now add people in a panic as we saw last year in the Cocos Fire that couldn't even get close to their homes to evacuate their families/pets or important documents. Now add the residents that will be in front of those fleeing that may also be evacuating. You might want to expect a flat tire or two and perhaps someone with mechanical problems. When does the Sheriff's Department start the evacuation process of those in the Lilac triangle? Will they have the lead time to safely and adequately evacuate all? What happens if there is a medical emergency during the evacuation? How will the EMTs be able to get to the emergency?

There are NO STANDARDS for the safe emergency evacuation of the residents outside of the project! Evacuation is handled by the Sheriff's Department. There has been no study or evaluation done with or between the Sheriff's Department and the Valley Center Fire Department (i.e. road engineers, fire department and Sheriffs) to evaluate road capacities and time needed to safely evacuate the Lilac triangle in an emergency situation such as a wildfire.

BEFORE YOU REVIEW THE PROJECT, PLEASE REQUIRE AN EMERGENCY EVACUATION TRAFFIC STUDY to be done to improve all three of the roads, including the Lilac bridge over I-15 and Old 395, that access the Lilac Triangle to

Attachment Page 146

safely evacuate the area in an emergency. However, if the project is approved, please REQUIRE the developer to improve (widen, straighten, add the turn outs and add safe bike lanes) all of the roads outside of the development as a condition of the development and prior to any work being done within the development itself. One last request, please do not allow people to loose their homes to EMINENT DOMAIN for the Lilac Hills Ranch development.

Sincerely,

Ray Ewing

Ray Ewing

Escondido 92026

Attachment Page 147

From: Mary Strow
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Wednesday, July 01, 2015 3:24:52 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Mary Strow

Poway 92064

Attachment Page 148

From: [Kathleen St. Peter](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, July 01, 2015 11:00:57 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Kathleen St. Peter

Oceanside 92054

Attachment Page 149

From: [Stephen Horn](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, July 01, 2015 7:26:39 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Stephen Horn

Valley Center 92082

Attachment Page 150

From: [darrin_freeman](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Monday, June 29, 2015 12:37:10 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

darrin freeman

bonsall 92003

Attachment Page 151

From: [Gab N Barb Rico](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Sunday, June 28, 2015 12:25:16 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Gab N Barb Rico

Bonsall 92003

Attachment Page 152

From: [Linda Pierce](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Sunday, June 28, 2015 11:55:45 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Linda Pierce

Bonsall 92003

Attachment Page 153

From: [Maureen Gupta](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Sunday, June 28, 2015 9:48:03 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Maureen Gupta

Bonsall 92003

Attachment Page 154

From: [Gabe Cooley](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Sunday, June 28, 2015 8:48:20 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Gabe Cooley

Bonsall 92003

Attachment Page 155

From: [Jan Shuttleworth](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, June 27, 2015 10:37:00 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

I am a retired Firefighter that moved to this beautiful rural area 12 years ago. I moved here for the peaceful quite living that I planned my retirement years for.

I am extremely concerned about the situation these new homes and over 5200 new residents will cause in case of a fire and evacuation. These substandard road and access in and out of the area is a recipe for disaster. The Deer Springs Fire Protection district has already stated that they will not be able to meet the response requirements with the new development.

Close to 40 existing homeowners stand a chance of losing there own property that they have worked so hard for. This urban development has no business being placed right in the middle of a rural area like this.

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

PLEASE DENY this General Plan Amendment that places this urban island in the middle of this rural area.

Respectfully submitted,

Jan Shuttleworth

Escondido 92026

Attachment Page 156

From: [Rita Starnes](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 5:54:15 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Rita Starnes

Fallbrook 92028

Attachment Page 157

From: [Bonnie Herman](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 3:59:16 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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These developers all had a chance to participate in the General Plan process and chose to sit it out opting to seek a General Plan Amendment when it was not in front of the county wide public. Please stick with the approved General Plan and deny any proposed amendments.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Bonnie Herman

Bonsall 92003

Attachment Page 158

From: [Michele Dollase](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 3:54:49 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Michele Dollase

Bonsall 92003

Attachment Page 159

From: [David Cantrell](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 2:09:43 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

David Cantrell

Bonsall 92003

Attachment Page 160

From: Edward and Nancy Anderson
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 1:52:20 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

Edward and Nancy Anderson

Bonsall 92003

Attachment Page 161

From: Edward and Nancy Anderson
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 1:52:20 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Edward and Nancy Anderson

Bonsall 92003

Attachment Page 162

From: Kathryne & Patrick Morse
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 11:37:09 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Kathryne & Patrick Morse

Fallbrook 92028

Attachment Page 163

From: [Bradford Jordan](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, June 25, 2015 5:59:26 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Bradford Jordan

Fallbrook 92028

Attachment Page 164

From: [Phyllis Zenz](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, June 25, 2015 5:36:40 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Phyllis Zenz

Fallbrook 92028

Attachment Page 165

From: [Darlene Harty](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, June 25, 2015 5:20:49 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Darlene Harty

Fallbrook 92028

Attachment Page 166

From: [Karen Jackson](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 7:09:56 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. The county needs to adhere to the General Plan. The primary responsibility of the County is to ensure public safety and welfare. This project jeopardizes both.

A project of this density in this location places residents in severe, life threatening danger when (and it is not if, but when) we have another wildfire. The fire department CANNOT meet the 5 minute response time.

The project needs to take eminent domain from approximately 39 private land owners and DESTROY 3 HOMES.

The project design DOES NOT OWN LEGAL RIGHTS to use existing Covey Lane, Rodriguez, and Mountain Ridge Private Roads for the Projects' intended uses.

Proposed Public Road are inadequate roads to safely accommodate traffic loads generated by the Project. Existing Public Roads are narrow and winding, not meeting County Standards in their present as built configuration. The Project does not propose adequate improvements to these roads to meet minimum safety requirements.

Instead, the Project requests TEN EXCEPTIONS to County Road Standards. How is this safe?

What happens when 5,200 new residents are on their way to work and the EDCO truck is blocking traffic, or when the many sewage trucks are hauling out the daily sewage (since there is currently no disclosed plan for treating sewage locally) and of course, when we are trying to evacuate. Every day you encounter a vehicle that veers across into the wrong lane. If you are in the wrong place when such occurs, there is virtually no where to go except to crash into the side of a hill, or go over an embankment. Increasing traffic load on these roads increases the possibility for more injury and fatalities (another major safety concern).

This project has severe and insurmountable problems that have been communicated in the responses to the EIR. The County has not addressed these problems with the Public.

Attachment Page 167

Accretive Investments took a risk, buying land in the hopes of building a project that was not consistent with the previous General Plan nor the current General Plan. This does not give them entitlement to do whatever they want because they own SOME of the property in the area. Don't the existing property owners in San Diego County also have rights? Isn't the County Plan for Land Use the Current General Plan?

If the County does not uphold the General Plan, anyone can build anything anywhere they want. What are people to believe in? How can people make decisions about where they want to live and what kind of communities they want to live if we don't adhere to our General Plan.

Build village densities in locations close to employment centers with existing infrastructure, as the General Plan provides. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Karen Jackson

Escondido 92026

Attachment Page 168

From: [Lynn Horn](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 4:04:45 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Lynn Horn

Valley Center 92082

Attachment Page 169

From: [Ruth Epstein](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 17, 2015 4:44:54 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Ruth Epstein

Janul 91935

Attachment Page 170

From: [Ann Howard](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 12:03:25 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Ann Howard

Valley Center 92082

Attachment Page 171

From: [dolores fleck](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 8:28:32 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

dolores fleck

fallbrook 92028

Attachment Page 172

From: [Nancy Wright](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 7:59:28 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Nancy Wright

FALLBROOK 92028

Attachment Page 173

From: [Jeff Johnson](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 7:49:57 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Jeff Johnson

VC 92026

Attachment Page 174

From: [Teri Hansen](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 6:50:02 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Teri Hansen

Vista 92084

Attachment Page 175

From: [Hans Haas](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Tuesday, June 23, 2015 9:45:07 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Not to mention we are in a severe drought.

Sincerely,

Hans Haas

Valley Center 92082

Attachment Page 176

From: [Elaine Pedigo](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Tuesday, June 23, 2015 8:46:27 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Elaine Pedigo

Fallbrook 92028

Attachment Page 177

From: [Robert Marnett](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Tuesday, June 23, 2015 3:44:41 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

I moved here from Huntington Beach to obtain the safety of a rural environment for my family which the Lilac Hills development will destroy. My house is less than a mile from the proposed development. The traffic density on West Lilac will create an unsolvable travel hazard.

Sincerely,

Robert Marnett

Bonsall 92003

Attachment Page 178

From: [Allen Binns](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Monday, June 22, 2015 1:42:56 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Allen Binns

San Marcos 92069

Attachment Page 179

From: [Karen Binns](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Monday, June 22, 2015 1:40:48 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Karen Binns

San Marcos 92069

Attachment Page 180

From: [Carol Gartner](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Sunday, June 21, 2015 10:30:45 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Carol Gartner

Valley Center 92082

Attachment Page 181

From: [P Gray](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, June 18, 2015 10:26:28 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

P Gray

San Marcos 92078

Attachment Page 182

From: [Ruth Epstein](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 17, 2015 4:44:54 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

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Sincerely,

Ruth Epstein

Janul 91935

Attachment Page 183

From: [P.Gray](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, June 18, 2015 10:26:28 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

P Gray

San Marcos 92078

Attachment Page 184

From: [Carol Gartner](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Sunday, June 21, 2015 10:30:45 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Carol Gartner

Valley Center 92082

Attachment Page 185

From: [Karen Binns](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Monday, June 22, 2015 1:40:48 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Karen Binns

San Marcos 92069

Attachment Page 186

From: [Allen Binns](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Monday, June 22, 2015 1:42:56 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Allen Binns

San Marcos 92069

Attachment Page 187

From: [Robert Marnett](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Tuesday, June 23, 2015 3:44:41 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

I moved here from Huntington Beach to obtain the safety of a rural environment for my family which the Lilac Hills development will destroy. My house is less than a mile from the proposed development. The traffic density on West Lilac will create an unsolvable travel hazard.

Sincerely,

Robert Marnett

Bonsall 92003

Attachment Page 188

From: [Elaine Pedigo](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Tuesday, June 23, 2015 8:46:27 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Elaine Pedigo

Fallbrook 92028

Attachment Page 189

From: [Hans Haas](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Tuesday, June 23, 2015 9:45:07 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Not to mention we are in a severe drought.

Sincerely,

Hans Haas

Valley Center 92082

Attachment Page 190

From: [Teri Hansen](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 6:50:02 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Teri Hansen

Vista 92084

Attachment Page 191

From: [Jeff Johnson](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 7:49:57 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Jeff Johnson

VC 92026

Attachment Page 192

From: [Nancy Wright](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 7:59:28 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

Nancy Wright

FALLBROOK 92028

Attachment Page 193

From: [dolores_fleck](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 8:28:32 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

dolores fleck

fallbrook 92028

Attachment Page 194

From: [Ann Howard](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 12:03:25 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Ann Howard

Valley Center 92082

Attachment Page 195

From: [Ray Ewing](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 3:32:18 PM

To the San Diego County Planning Commissioners:

I am writing to request the denial of the Lilac Hills Ranch project for one very important reason. The issue is with the safe evacuation of the area residents in the event of a wildfire. While I recognize that you will certainly receive many emails and letters that will talk about and cite the many failings of this development at many levels and the lack of community support, my concern is with an issue not addressed and one that does not have standards in place.

I'm sure that you recognize that the Lilac triangle is a pocket on a plateau with only three roads in/out of it. While we have always expected the Santa Ana winds from the east to carry a wildfire westerly, last year (May, 2014), we experienced a wildfire traveling from west to east. During a partial evacuation, the Lilac Bridge over I-15 became congested/blocked for almost two hours. The bottleneck forced the residents to go out the only two other routes. The only easterly route out, Lilac Rd., is narrow and winding, and in fact, they are so narrow with tight corners that school buses are restricted from utilizing that portion of Lilac.

My point is this. Please take the time to drive the area (just Circle R and Lilac (east of I-15 to Castle Creek), note the numerous High Fire Risk signs, narrow roads, tight corners, lack of guard rails and the lack of turn outs. Please also note the thousand of acres of natural vegetation, avocado and citrus trees, many now dying or dead due to the drought, which you might want to think of as 'fuel'. Now imagine a fast easterly traveling wildfire in Bonsall crossing over I-15 and Old 395 (or the same with a Santa Ana driven wildfire), that necessitates the evacuation of the 5,000+ residents of Lilac Hills Ranch plus the proposed 200 bed senior care facility in the LHR development plus the existing local residents in the Lilac triangle. Now also add the emergency vehicles that will be traveling on the roads and may be going against the evacuation traffic. Now add people in a panic as we saw last year in the Cocos Fire that couldn't even get close to their homes to evacuate their families/pets or important documents. Now add the residents that will be in front of those fleeing that may also be evacuating. You might want to expect a flat tire or two and perhaps someone with mechanical problems. When does the Sheriff's Department start the evacuation process of those in the Lilac triangle? Will they have the lead time to safely and adequately evacuate all? What happens if there is a medical emergency during the evacuation? How will the EMTs be able to get to the emergency?

There are NO STANDARDS for the safe emergency evacuation of the residents outside of the project! Evacuation is handled by the Sheriff's Department. There has been no study or evaluation done with or between the Sheriff's Department and the Valley Center Fire Department (i.e. road engineers, fire department and Sheriffs) to evaluate road capacities and time needed to safely evacuate the Lilac triangle in an emergency situation such as a wildfire.

BEFORE YOU REVIEW THE PROJECT, PLEASE REQUIRE AN EMERGENCY EVACUATION TRAFFIC STUDY to be done to improve all three of the roads, including the Lilac bridge over I-15 and Old 395, that access the Lilac Triangle to

Attachment Page 196

safely evacuate the area in an emergency. However, if the project is approved, please REQUIRE the developer to improve (widen, straighten, add the turn outs and add safe bike lanes) all of the roads outside of the development as a condition of the development and prior to any work being done within the development itself. One last request, please do not allow people to loose their homes to EMINENT DOMAIN for the Lilac Hills Ranch development.

Sincerely,

Ray Ewing

Ray Ewing

Escondido 92026

Attachment Page 197

From: [Lynn Horn](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 4:04:45 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Lynn Horn

Valley Center 92082

Attachment Page 198

From: [Karen Jackson](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, June 24, 2015 7:09:56 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. The county needs to adhere to the General Plan. The primary responsibility of the County is to ensure public safety and welfare. This project jeopardizes both.

A project of this density in this location places residents in severe, life threatening danger when (and it is not if, but when) we have another wildfire. The fire department CANNOT meet the 5 minute response time.

The project needs to take eminent domain from approximately 39 private land owners and DESTROY 3 HOMES.

The project design DOES NOT OWN LEGAL RIGHTS to use existing Covey Lane, Rodriguez, and Mountain Ridge Private Roads for the Projects' intended uses.

Proposed Public Road are inadequate roads to safely accommodate traffic loads generated by the Project. Existing Public Roads are narrow and winding, not meeting County Standards in their present as built configuration. The Project does not propose adequate improvements to these roads to meet minimum safety requirements.

Instead, the Project requests TEN EXCEPTIONS to County Road Standards. How is this safe?

What happens when 5,200 new residents are on their way to work and the EDCO truck is blocking traffic, or when the many sewage trucks are hauling out the daily sewage (since there is currently no disclosed plan for treating sewage locally) and of course, when we are trying to evacuate. Every day you encounter a vehicle that veers across into the wrong lane. If you are in the wrong place when such occurs, there is virtually no where to go except to crash into the side of a hill, or go over an embankment. Increasing traffic load on these roads increases the possibility for more injury and fatalities (another major safety concern).

This project has severe and insurmountable problems that have been communicated in the responses to the EIR. The County has not addressed these problems with the Public.

Attachment Page 199

Accretive Investments took a risk, buying land in the hopes of building a project that was not consistent with the previous General Plan nor the current General Plan. This does not give them entitlement to do whatever they want because they own SOME of the property in the area. Don't the existing property owners in San Diego County also have rights? Isn't the County Plan for Land Use the Current General Plan?

If the County does not uphold the General Plan, anyone can build anything anywhere they want. What are people to believe in? How can people make decisions about where they want to live and what kind of communities they want to live if we don't adhere to our General Plan.

Build village densities in locations close to employment centers with existing infrastructure, as the General Plan provides. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Karen Jackson

Escondido 92026

Attachment Page 200

From: [Darlene Harty](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, June 25, 2015 5:20:49 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Darlene Harty

Fallbrook 92028

Attachment Page 201

From: [Phyllis Zenz](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, June 25, 2015 5:36:40 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Phyllis Zenz

Fallbrook 92028

Attachment Page 202

From: [Bradford Jordan](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, June 25, 2015 5:59:26 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Bradford Jordan

Fallbrook 92028

Attachment Page 203

From: Kathryne & Patrick Morse
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 11:37:09 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Kathryne & Patrick Morse

Fallbrook 92028

Attachment Page 204

From: [Edward and Nancy Anderson](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 1:52:20 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Edward and Nancy Anderson

Bonsall 92003

Attachment Page 205

From: [Edward and Nancy Anderson](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 1:52:20 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

Edward and Nancy Anderson

Bonsall 92003

Attachment Page 206

From: [David Cantrell](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 2:09:43 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

David Cantrell

Bonsall 92003

Attachment Page 207

From: Michele Dollase
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 3:54:49 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Michele Dollase

Bonsall 92003

Attachment Page 208

From: [Bonnie Herman](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 3:59:16 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

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These developers all had a chance to participate in the General Plan process and chose to sit it out opting to seek a General Plan Amendment when it was not in front of the county wide public. Please stick with the approved General Plan and deny any proposed amendments.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Bonnie Herman

Bonsall 92003

Attachment Page 209

From: [Rita Starnes](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, June 26, 2015 5:54:15 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Rita Starnes

Fallbrook 92028

Attachment Page 210

From: [Jan Shuttleworth](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, June 27, 2015 10:37:00 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

I am a retired Firefighter that moved to this beautiful rural area 12 years ago. I moved here for the peaceful quite living that I planned my retirement years for.

I am extremely concerned about the situation these new homes and over 5200 new residents will cause in case of a fire and evacuation. These substandard road and access in and out of the area is a recipe for disaster. The Deer Springs Fire Protection district has already stated that they will not be able to meet the response requirements with the new development.

Close to 40 existing homeowners stand a chance of losing there own property that they have worked so hard for. This urban development has no business being placed right in the middle of a rural area like this.

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

PLEASE DENY this General Plan Amendment that places this urban island in the middle of this rural area.

Respectfully submitted,

Jan Shuttleworth

Escondido 92026

Attachment Page 211

From: [Gabe Cooley](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Sunday, June 28, 2015 8:48:20 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Gabe Cooley

Bonsall 92003

Attachment Page 212

From: [Maureen Gupta](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Sunday, June 28, 2015 9:48:03 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Maureen Gupta

Bonsall 92003

Attachment Page 213

From: [Linda Pierce](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Sunday, June 28, 2015 11:55:45 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Linda Pierce

Bonsall 92003

Attachment Page 214

From: [Gab N Barb Rico](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Sunday, June 28, 2015 12:25:16 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Gab N Barb Rico

Bonsall 92003

Attachment Page 215

From: [darrin.freeman](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Monday, June 29, 2015 12:37:10 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

darrin freeman

bonsall 92003

Attachment Page 216

From: [Stephen Horn](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, July 01, 2015 7:26:39 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Stephen Horn

Valley Center 92082

Attachment Page 217

From: [Kathleen St. Peter](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, July 01, 2015 11:00:57 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Kathleen St. Peter

Oceanside 92054

Attachment Page 218

From: [Mary Strow](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, July 01, 2015 3:24:52 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Mary Strow

Poway 92064



Connect. Develop. Grow.

760.510.3179 info@sdnedc.org 950 Boardwalk, Suite 303 San Marcos, CA 92078

www.sdnedc.org

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City of Encinitas
Josh Williams
BW Research
Mayor Jim Wood
City of Oceanside
Sam Jamal (Ex-Officio)
Camp Pendleton

April 27, 2015

Bryan Woods
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

RE: ENDORSEMENT OF LILAC HILLS RANCH

Dear Commissioner Bryan Woods:

The Lilac Hills Ranch project was presented to the San Diego North Economic Development Council ("SDNEDC") Public Policy Committee on April 2nd and Board of Directors on April 9th. The presentation demonstrated that the Project, as proposed, meets all of the following SDNEDC criteria:

1. Mix of housing,
2. Mixed use,
3. Open space,
4. Transportation corridor,
5. Infill,
6. Money contributed to infrastructure,
7. Compliance with general plan / zoning, and
8. No public subsidy

The applicant has demonstrated that the project does not contain any of what we call the, "bad traits" which are:

1. public subsidy,
2. variance to plans,
3. leap frog development,
4. polluting,
5. noisy.

We need quality housing options located next to the major transportation corridor in North County to retain and attract more good-paying jobs. For that reason, the San Diego North Economic Development Council strongly supports the plans and development of Lilac Hills Ranch due to the features described above and the need to support job growth in North County by giving good jobs great places to sleep at night. Please vote to support this fine addition to North County.

Sincerely,

Carl S. Morgan
Chief Executive Officer
San Diego North
Economic Development Council

ELIZABETH BULKLEY

elizabethbulkley@mac.com

July 16, 2015

TO: Mark Slovick, Project Manager Lilac Hills ranch

Cc: Kristin Blackson

FROM: Peter and Elizabeth Bulkley: APN 129-190-37; 129-190-36

9885 West Lilac Rd, Escondido CA 92026

RE: Project: Lilac Hills Ranch

110 parcels or 1746 parcels

Dear Mark:

Thank you for your interest in my letters in the past. We continue to be diabolically opposed to this project. We live on the corner of West Lilac Rd., Covey Lane and Rodriguez Road, so will be negatively affected in several ways by this project. We have lived here for 42 years and have no intention of selling to Acretive. There are many, many reasons why this project is unacceptable.

Is the County of San Diego willing to explain to San Diego residents why it is acceptable to allow 1746 houses in an area of rugged topography when the private citizens have paid \$18.6 million dollars and 12 years of employee time for a General Plan that recommends 110 homes?

The following are just a few of the reasons why this project must not be adopted:

1. Requiring 39 private citizens living on Mountain Ridge Rd. to give up property via eminent domain to a private developer in order to satisfy Acretive's requirements of ingress and egress. This is illegal and unethical. Also, Mountain Ridge Rd. is an emergency access road during fires. Where do we

Attachment Page 221

go while this road is being worked on? Who pays for the alternative? Are non/Lilac Ranch residents allowed to use this access?

Page 2

2. The General Plan housing needs for San Diego County have already been planned for and met. This has been designated as an agricultural area with narrow, scenic roads where there are 13 state designated species of wild animals. It will also destroy 608 acres of raptor foraging and nesting areas.

3. WATER, WATER, WATER – Will the construction company only be allowed to use water 2 days a week for their 4 million cubic yards of dirt and granite that need blasting and moving like the people who live here? This project will require 2 ½ times the amount of water being used now. HOW CAN THIS BE JUSTIFIED?

4. FIRE, FIRE, FIRE – This is designated by CAL FIRE Wildland Fire ranking as “Very High” to “High”. Deer Springs Fire Dept. has not signed off on plans that were offered to them and Cal Fire at this time will not have anything to do with this project. What are the insurance companies saying about this?

I am not even addressing the traffic problems. I-15 during rush hour is already at all stops. The developments at the North-East corner of I-15 and Hwy. 76 have not been built. The intersection of Old 395 and West Lilac Road is becoming dangerous because of the added traffic trying to detour I-15.

I look forward to hearing from your committee when there are meetings and new developments regarding Lilac Ranch.

Yours sincerely,

Elizabeth Bulkley

Attachment Page 222

From: Jack Fox
To: Fitzpatrick, Lisa
Cc: Jack Fox
Subject: NO to Lilac Hills Ranch project
Date: Friday, July 17, 2015 5:27:14 PM

Commission members,
I am opposed to this project for many reasons a few of which I have noted here..

- 1..Worst drought in California history
- 2..Not the right location
- 3..No public transportation
- 4..No school..over crowding of existing schools
- 5..More traffic
- 6..No fire protection
- 7..No ambulance service especially for those in the senior care center
- 8..Over burdening the I-15
- 9..Private property to be taken by eminent domain
- 10..Using Ag land for development
- 11..Developer is evasive about the entire project when asked to disclose specifics details regarding this project.
- 12..This is leap frog developing
- 13..Millions were spent to create the new General Plan
- 14..Many volunteer hours were devoted to plan a comprehensive General Plan

I am pleading with you to use good judgement when making your decision and to deny this request to save our rural community..

Sincerely,
John Fox
8612 Nelson Way
Escondido, Ca. 92026

Attachment Page 223

From: [Ursula Sack](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, July 02, 2015 9:16:01 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Ursula Sack

Vista 92084

Attachment Page 224

From: [William Young](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 11:19:47 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

William Young

San Marcos 92069

Attachment Page 225

From: [Patrice Promack](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 9:09:30 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places. Go ahead and DOUBLE what current zoning allows...let them build 220 new homes. But NOT 1746 new residences!!!! The additional 7 million auto trips per year that would be the result of 5000 new residents....simply unacceptable. WRONG LOCATION!!!

Sincerely,
Patrice Promack

Patrice Promack

San Marcos 92069

Attachment Page 226

From: [Greg Duchnak](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 8:27:34 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

My family and I live less than a mile from this project where we have enjoyed more than 20 years of country living. We relocated from Shadowridge in Vista with young children to experience rural living.

For more than 10 years my family and I walk West Lilac road from Running Creek to the Old HYW 395. This is one of the most peaceful, safe and enjoyable walks through the country side. Our family walks have been an important part of our enjoyment. We compare this area to the southern hill sides in Spain and France. A very special place. West Lilac is also one of the premier bicycling routes in the area. We often see entire clubs scooting by us during our walk. If this development is permitted to be constructed it will ruin this special place.

For years I have been actively following both this development and the one originally planned for Lilac Ranch on the old Solomon property by attending regular Valley Center Planning meetings. In listening to the many people speaking for and against this project over the last few years I realize that the only people from Valley Center that are in favor of this development have personal gains associated with having some part of future employment during the building of the development, or those from central Valley Center that think the development will reduce the requirement for the 6,400 homes designated for Valley Center in the 2011 General Plan. This is a very small but vocal group supported by the development. Our local neighborhood directly impacted by such a large development in our rural area has been almost unanimous in their objection to this project.

I know that you are elected to represent the local communities throughout San Diego County. I hope you place an appropriate level of emphasis on the voice of your constituents most impacted by such a plan and not the development community that has no long term interest in our community.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Greg Duchnak

Escondido 92026

Attachment Page 227

From: [Mary Clarke](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 7:58:43 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Mary Clarke

Oceanside 92056

Attachment Page 228

From: [Jennifer Cox](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 7:54:01 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Jennifer Cox

Santee 92071

Attachment Page 229

From: [Therese FitzRandolph](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 7:13:30 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Therese FitzRandolph

San Diego 92115

Attachment Page 230

From: ALAN MILLER
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 6:28:48 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

ALAN MILLER

BONSALL 92003

Attachment Page 231

From: [Bruce Foltz](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 6:24:49 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

Bruce Foltz

Vista 92084

Attachment Page 232

From: [Joaquin Aganza](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 6:18:55 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

Joaquin Aganza

Valley Center 92082

Attachment Page 233

From: [john.turner](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 4:42:39 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

john turner

valley center 92082

Attachment Page 234

From: [Anne Peterson](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 4:29:37 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

Anne Peterson

Los Angeles 90007

Attachment Page 235

From: [Yolanda Carmona](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 4:23:18 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Sincerely,

Yolanda Carmona

valley center 92082

Attachment Page 236

From: [Cynthia morello](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 3:26:08 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

Cynthia morello

san diego 92108

Attachment Page 237

From: [Anna Reisman](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 2:54:51 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

Anna Reisman

Fallbrook 92028

Attachment Page 238

From: Mary Ward
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 2:54:21 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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Sincerely,

Mary Ward

Fallbrook 92028

Attachment Page 239

From: [Lawrence Gartner](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 2:05:06 PM

To the San Diego Planning Commissioners:

I am outraged at the efforts of a developer to destroy our precious Valley Center community with an unneeded and unwanted development of extreme density. I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Please listen to those who live and work in this town and county. Do not listen to the money grubbing carpet niggers. Deny them.

Sincerely,
Lawrence M. Gartner, M.D.
28398 Alamar Road
Valley Center, CA 92082

Lawrence Gartner

Valley Center 92082-6452

Attachment Page 240

From: [Debra Siebert](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 1:21:35 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

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We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Debra Siebert

San Marcos, CA 92069

Attachment Page 241

From: Don Wood
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 1:13:34 PM

San Diego County Planning Commissioners:

Please deny any County General Plan exemptions for the proposed Lilac Hills Ranch sprawl subdivision project for the following reasons:

This project is far outside the recently updated General Plan. The developer is asking the County to throw away more than ten years of consensus building in favor of stupid growth, creating high density housing with no connections to jobs and no connection to the region's public transportation system, all in order to make a quick buck for the developer.

We do not need this housing. The approved 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan already calls for adding 6,400 new dwellings, between 2,500-3,000 of these In Valley Center proper at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in outlying rural places. San Diego County spent 13 years and \$18.6 million to develop and update its General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated backcountry parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services. Lilac Hills lays in one of those areas.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Don Wood

La Mesa 91941

Attachment Page 242

From: [Caylin Frinchaboy](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 1:03:00 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Caylin Frinchaboy

Valley Center 92082

Attachment Page 243

From: [Michael Karp](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 12:56:35 PM

To the San Diego Planning Commissioners:

I am writing to request that deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

This area of Valley Center is meant for agriculture. A large residential project will be incompatible with man farming activities. This will further handicap agriculture in this area. Agriculture is already severely handicapped due to the increased water expense and water restrictions.

Sincerely,

Michael Karp

Valley Center 92082

Attachment Page 244

From: [Francis Eason](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 12:54:52 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

This is clearly the "leap frog" type of development that is appropriately prohibited by our general plan and no fabricated reasons to allow it should be considered.

Sincerely,

Francis Eason

SAN MARCOS 92069

Attachment Page 245

From: [David Grubb](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 12:30:10 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

New development should be located close to existing infrastructure and amenities. This is essential to reducing VMT and the associated GHG emissions. Infill development in already urbanized areas is a far better approach.

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

David Grubb

Cardiff 92007

Attachment Page 246

From: [Kathlyn Robbins](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 12:12:34 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

The need for housing is in the transportation corridors such as the Sprinter and Coaster lines. It is time for the county to stick to the General Plan.

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Kathlyn Robbins

San Marco 92069

Attachment Page 247

From: [Edward and Nancy Anderson](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 11:25:59 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Edward and Nancy Anderson

Bonsall 92003

Attachment Page 248

From: [Laura Glusha](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 8:28:33 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Laura Glusha

Escondido 92025

Attachment Page 249

From: [Cheryl Ann Howard](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Saturday, July 18, 2015 6:55:54 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Cheryl Ann Howard

Valley center 92082

Attachment Page 250

From: [Nancy Santiago](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, July 17, 2015 10:35:42 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Nancy Santiago

Valley Center 92082

Attachment Page 251

From: [eric laventure](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Friday, July 17, 2015 4:12:57 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

eric laventure

valley center 92082

Attachment Page 252

From: [Adrienne Fuller](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, July 16, 2015 5:52:28 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Adrienne Fuller

Valley Center 92082

Attachment Page 253

From: [Mary Kate May](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Thursday, July 16, 2015 7:43:51 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Mary Kate May

San Marcos 92078

Attachment Page 254

From: Mr. & Mrs. Peter B. Nelson (anne marie & pete) Nelson
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Tuesday, July 14, 2015 7:10:51 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Mr. & Mrs. Peter B. Nelson (anne marie & pete) Nelson

valley center 92082

Attachment Page 255

From: [Stephen Horn](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Monday, July 13, 2015 12:56:29 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Stephen Horn

Valley Center 92082

Attachment Page 256

From: [Nancy Bergstrom](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Monday, July 13, 2015 7:36:57 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Nancy Bergstrom

Fallbrook 92028

Attachment Page 257

From: [Paul Wheatley](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Wednesday, July 08, 2015 5:05:41 PM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Paul Wheatley

valley center 92082

Attachment Page 258

From: [Suzanne kraus](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Tuesday, July 07, 2015 10:09:47 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Suzanne kraus

Valley Center 92082

Attachment Page 259

From: [Sandy Heath](#)
To: [Fitzpatrick, Lisa](#)
Subject: Save Our San Diego Countryside
Date: Monday, July 06, 2015 8:08:03 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Sandy Heath

Valley center 92093

Attachment Page 260

From: Susan Moore
To: Fitzpatrick, Lisa
Subject: Save Our San Diego Countryside
Date: Monday, July 06, 2015 6:20:50 AM

To the San Diego Planning Commissioners:

I am writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

We do not need this housing. The 2011 General Plan accommodates 72,683 new dwellings. In Valley Center alone, the plan calls for 6,400 new dwellings, between 2,500-3,000 of these at Village densities where housing will be priced in the \$300K-\$500K range.

We should not build village densities in rural places. San Diego County spent 13 years and \$18.6 million to develop a General Plan that accommodates significant growth while still protecting open space, wildlife and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, wildfire susceptibility, lack of infrastructure and are far from jobs and city services.

This project's severe and insurmountable problems with substandard roads, deficient fire and emergency response times, dangerously overburdened wildfire evacuation routes, urban water requirements that are 2.5 times greater than rural uses, destruction of protected waterways, and the taking of private land from families who are unwilling to sell are all a result of its rural location.

Please represent the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update. Respect the Smart Growth principles that undergird the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Susan Moore

Valley Center 92082