



July 29, 2015

Bryan Woods, Chairman  
San Diego County Planning Commission  
5520 Overland Ave.  
San Diego, CA 92123

**RE: Lilac Hills Ranch (Hearing Date, August 7, 2015) – OPPOSITION**

Dear Chairman Woods and Commission Members:

It would be a grave mistake to approve Lilac Hills Ranch. As a participant in the historic 2011 General Plan Update, Endangered Habitats League understands how it would dismantle our “smart growth” framework of towns and greenbelts. Please deny this wholly discretionary request to amend the General Plan.

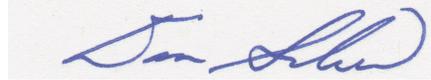
Lilac Hills is not needed to accommodate population growth. Instead of building out Valley Center’s existing villages, it would drain life from them. Instead of preserving rural and farm greenbelts, it would impose a suburban development the size of Del Mar.

A thin veneer of “walkability” cloaks what is actually auto-dependent sprawl. For example, the Southern “Neighborhood Center” has a mere 0.4 acre or 2500 sq. ft. of commercial space. In any event, residents will still commute long distances to work and to most shopping, defeating the goal of improving the County’s greenhouse gas emissions. Multimodal transportation? How many people are going to travel miles on the I-15 *to get on a bus* at SR 76? Absent any supporting information, this is the “transit” the Final EIR relies on. In actuality, average vehicle trip lengths would be much longer than the County as a whole and its vehicle miles traveled are not much different than those of *rural* Valley Center. There is no progress here. The North County Transit District has no plans to *ever* serve this area; the wishful speculation in the FEIR is fantasy rather than a basis for project approval. When the Staff Report absurdly finds that the project reduces vehicle trips because of its “1746 dwelling units which will increase demand within the region for public transportation” all credibility has been lost.

And ominously, project approval would substitute a “green” point system developed by the trade association of the building industry for the current “leapfrog” restrictions in Land Use Policy 1.2. Without environmental review or public debate, this new system would eliminate any locational test *whatsoever* for new development, even though the entire General Plan Update was *promised* upon proper location. The entire backcountry would be opened to sprawl. Furthermore, when the LEED-ND standard in LU 1.2 *precludes* Lilac Hills Ranch due to its location, and the substitute system blesses it, there can be no equivalency, as LU 1.2 requires. Finally, Board direction earlier this year was to study *options* for LU 1.2; project approval would preempt these vital deliberations.

Lilac Hills Ranch was considered and rejected during the 2011 General Plan Update. Nothing has changed since then. Please maintain the integrity of the General Plan, protect San Diego's countryside, and advance *real* smart growth by denying Lilac Hills Ranch.

Yours truly,

A handwritten signature in blue ink, appearing to read "Dan Silver", is centered on a light gray rectangular background.

Dan Silver, MD  
Executive Director