Attachment B – Public Documentation
Attachment B

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 X 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
X Deny
□ Continue

VOTE: 4 Yes 0 No 0 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

5510 OVERLAND AVE, SUITE 110, SAN DIEGO, CA 92123 • (858) 565-5981 • (888) 267-8770
http://www.sdcounty.ca.gov/pds

PDS-534 (Rev. 09/04/2013)
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. Responses: 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.
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.
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**

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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.
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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Page 6 - 13

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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.
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.
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.
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:
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 overwhelming.

“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 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.

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, 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.
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

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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 reiterate 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, Margarette Morgan


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 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.

2 | P a g e
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, Margarette 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 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."
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
Valley Center Design Review Board

February 25, 2013

TO: Mark Slovick, Larry Hofreiter, Jarrett Ramalya, 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 bully and bully its way past procedures that everyone else follows? From the get-go this applicant has gained 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
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.
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: 5 acres
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.

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
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 1748 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.
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 spayed 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
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 1745).

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:
   a. destroying agriculture conserves agriculture;
   b. adding 1746 homes/ 5000 residents to back-country roads improves traffic;
   c. "compact" urban development of this rural area allows for increased open space and natural habitat;
   d. grading 4 million cubic yards of dirt respects natural landforms and preserves natural resources;
   e. 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.)
   f. 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.)
   g. (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 rewrite them!

9) The proposal is also rife with errors, distortions and/or misrepresentations.

   A few examples are:
   a. 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);
   b. Slopes mapped with 10-foot contours reveal significantly less coverage in 25% slopes than County standard contours;
   c. 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;
   d. 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.
   e. Asserting "compact development" when edge-effects of this sprawling configuration impact adjacent rural properties for a distance of some 8 miles.
   f. 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
“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.
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 1748 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 feathering 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 1/2 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. 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.

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.

The Valley Center Design Review Board
Lael Montgomery, Chair
Jeff Herr
Susan Moore
Keith Robertson
Robson Splane
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): PDS2015-3801-12-001 GP, PDS2012-3801-12-001 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
   Rescued

C. Recommended conditions of approval:
   N/A

Reported by: STEVEN HATCHISON 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.LUES@sdcounty.ca.gov
5510 Overland Ave, Suite 110, San Diego, CA 92123 • (858) 565-0001 • (858) 267-9770
http://www.sdcournty.ca.gov/pds
PDS-534 (Rev. 06/14/2013)
County of San Diego, Planning & Development Services
COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT REVIEW
ZONING DIVISION

Record ID(s): DSC-2015-0801-12-001-16A, DSC-2015-0801-12-001-17F
Project Name: Loma L. Hills Ranch
Project Manager: Mark Sevick
Project Manager's Phone: 619-495-5192

Scope of Review:
The Board Policy 17 states: "provides 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 comments 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 is submitted, 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.

1010 Overland Ave, Suite 110, San Diego, CA 92123  |  (619) 695-9681  |  (800) 267-6770
http://www.sandiego.gov/pds
PDS-534 (Rev. 09/14/2013)
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 immittigable level of service issues, the Project will peril 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, irremediable 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.
Large files - trying to fit within 5 MB.

Will be 3 files

Mark Jackson
760-731-7327
We need to get James to a remedial course on file compression

Mark Jackson
760-731-7327
Hi Edith,

Thank you for your email. I will include your email in the project file and staff report when the project goes forward to the Board of Supervisors for a final decision on the project.

Please let me know if you have any other questions.

Thanks,

Mark Slovick, Deputy Director
County of San Diego | Planning & Development Services
T. 858.495.5172

This Lilac Hills is worse than the last one that was voted down. The only thing the paper writes is the problem of traffic and infrastructure. The biggest problem is the lack of water. Water is very expensive. Our valley is full of chopped down avocado trees and dead orange groves. Water will be even more expensive since the county has changed providers. We cannot handle 5000 more users. I hope this can be put up to a vote again.

H. James and Edith Jordan, Pauma Valley.

Sent from my iPad

On Apr 5, 2018, at 1:34 PM, "Slovick, Mark" <Mark.Slovick@sdcounty.ca.gov> wrote:

Hi Edith,

If you have any comments on the Lilac Hills Ranch project, please send to back to this email.

Thanks,

Mark Slovick, Group Program Manager
County of San Diego | Planning & Development Services
5510 Overland Avenue | Suite 310 | San Diego | CA | 92123
T. 858.495.5172 | F. 858.694.3373 | MAIN 858.694.2960
PDS Website http://www.sdcounty.ca.gov/pds/index.html
PDS Mapping Service http://gis.co.san-diego.ca.us/
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PDS Website http://www.sdcounty.ca.gov/pds/index.html
PDS Mapping Service http://gis.co.san-diego.ca.us/
Hi Bill:

Good to see you last Friday. There is one key issue I would like to clarify with you that I believe is based on inaccurate information discussed in the FEIR and Staff Report. Both documents refer to a Landmark report that is part of the title search that seems to imply that the Easement for Mt. Ridge can be extended to other parties besides the easement holders. This is just not accurate. Landmark did state that; I and others (including legal teams) have repeatedly commented and corrected this statement over the last three years.

The Easements for Mt. Ridge (which I believe are Exhibit C and Exhibit D of Staff Report) clearly state: (1) that the Easement is an "Easement for road and utility purposes" and the that the Easement is for "the use and benefit of the present or future owner or owners" of the two Southern parcels that Accretive owns.

The Applicant just does not own the right to extend the use of the road for any reason to the balance of the 1,400 plus homes that are not a owner of the two parcels. Also, basing a project that relies on Mt. Ridge Road as a primary evacuation route and the only evacuation route to the south is a permanent overburdening of the easement. The easement may only be used intermittently for this purpose, but the burden on the easement is permeant -- and so is the harm to our community that owns the easement. In either situation, the Applicant just does not have the rights.

We may disagree on the legal implications, but give me a fair chance of not disagreeing on the facts. If you are relying in any way on the Landmark letter, please have Landmark verify their facts to you. We can disagree on stuff and that is fine --- but make sure that your decision making process is based on accurate information. I am exhausted arguing against Accretive's spin. They have controlled this process long enough -- I am asking the same as the rest of the Community at this point. Let's make sure that the spin and packaging is accurate.

James
Hi Mark:

Thanks again for a very professional presentation to the Planning Commissioners and also my thanks to the County team for working with the Community on the site visit. The tour went smoothly and efficiently without any drama.

Mark, at the Mt. Ridge Rd stop, you asked where the center line of the 40' wide Mt. Ridge Rd easement was. I should have marked it clearly but did not. Attached are two photos of Mt. Ridge Rd (by Megan) showing: (1) the beginning of the East side of the road easement (the white dotted lines) and (2) the orange traffic cone showing the Centerline of the 40" easement.

The westerly 20' of the road easement extends west from the orange traffic cone into the biological open space --- which is the third picture attached. (As a frame of reference, the street light in the third picture (top left of photo) is the street light at the intersection of Mt. Ridge and Megan; directly behind where the County team made its presentation.

Thanks again for a really well done presentation.

James
Ms. Aghassi,

I have attached a letter that addresses an apparent oversight in the investigation of the Mountain Ridge Road clearing that took place on 11 August 2015. Given the intense interest in the Lilac Hills Ranch development, I believe it is important to resolve issues such as those addressed in the attached letter. Given that the project applicant, Accretive Investments, will need permits for 10 requested wetland or riparian crossings, and likely for others off-site but not requested, the issues presented are an indication that those with regulatory authority and responsibility need to be circumspect with regard to these sensitive habitats.

Respectfully,

Steve Hutchison
Solving the “mystery” of the change to General Plan Policy LU1.2 made April 3, 2011

Patsy Fritz

No Supervisor works in a vacuum when he or she proposes a vote of the County Board of Supervisors. On April 13, 2011, Supervisor Roberts added an issue for Board consideration on the final day of voting on individual issues in the General Plan Update (concerns raised by the Board, by County Staff and by the public).

On that date, it was considered Land Use Policy LU1.4, but this subsequently was re-titled LU1-2. (In this report, consistent with the General Plan, it will be referred to as LU1.2) This is the text from the adopted San Diego County General Plan:

LU-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.

Supervisor Ron Roberts proposed the language granting exceptions to the prohibition of leapfrog development:
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 for Neighborhood Development Certification or an equivalent.

The wording of the text was worked out over the noon hour. Chief, Advanced Planning Devon Muto managed to convert a previous power-point slide for display to the Board because there was no time for the graphics department to produce a new one for the motion. Chief Deputy County Counsel Claudia Anzures served as Counsel to The Board of Supervisors that date and throughout the General Plan Update. There is now, in 2015, considerable discussion and wrangling both in the County offices and among the public over the insertion of the definitive requirement: “and that are designed to meet the LEED for Neighborhood Development Certification or an equivalent.”

A primary focus of LEED for Neighborhood Development (“LEED-ND”) is location of the proposed project: connectivity to urban development, offering public transportation, easy access to jobs and services. In our County General Plan, the accent is also on “Smart Growth” and the mandates of AB 32, California Global Warming Solutions Act of 2006.

Thus, both Chief, Advanced Planning Devon Muto and Chief Deputy Claudia Anzures would need a strong, definitive limiting qualification to exempt projects from the status of “leapfrog development,” or the Environmental Impact would be flawed by not accounting for increased Vehicle Miles Traveled and increased Greenhouse Gas produced if “leapfrog development exemptions” could be obtained anywhere within the County’s 800,000 acres of private property in the unincorporated area. Just as County Supervisors do not work in a vacuum, but rely on input and advice from the County’s professional planning staff and County Counsel, so, too, do changes to General Plan Policy need to be integrated into the whole – especially late changes, not vetted for all their implications and fallout by the Planning Commission. Thus, the demands of AB 32 loom large over the process. Prohibiting Leapfrog Development would serve that purpose.

Please note the following exchange with Deputy Attorney General Sarah Morrison’s comments, August 31, 2009 on the DEIR for the General Plan Update. She is corrected on her concern and assumptions that the new General Plan would include “New Villages” (whether permitted or prohibited leapfrog development). The County’s response to comments clearly states

“A core tenet of the General Plan update is not to create new communities but to concentrate future growth around the cores of existing communities.”

With this affirmation to the Attorney General in mind, neither Mr. Muto nor Ms. Azures could hardly recommend a change in General Policy text for Supervisor Roberts that offered “flexibility” permitting leapfrog development without geographic constraint. LEED-ND does feature geographic constraints. Otherwise the potential of increased VMTs and GHG would require calibration and a do-over of sections of the General Plan – a prospect no one wanted at that late date. A strong goal of the General Plan Update was to apply stability and reliability to the development process. We heard the Supervisors state, “What you see is what you get!”

Patsy Fritz

Please review the following County documents for affirmation:

County’s response to the California Attorney General’s August 31, 2009 comment letter on the 2011 County General Plan’s EIR:
Responses to Letter S 1, California Attorney General

Letter Commenter
S 1 Attorney General, Department of Justice, State of California

San Diego County DPLU response:

S1-6 The comment states that the DEIR has not adequately discussed the potential impacts from the General Plan Update’s proposal for developing “Villages,” which are the urbanized cores in the less developed areas of the County. The County does not agree. **First, the comment incorrectly suggests that the General Plan Update will create “Villages.” A core tenet of the General Plan update is not to create new communities but to concentrate future growth around the cores of existing communities.** This concept is discussed under the guiding principles of General Plan Update (Chapter 2 of the draft General Plan) and is supported by the Community Development Model. Goals and policies in the draft Land Use Element (Chapter 3) support this approach, **which is also evident in the draft community maps showing proposed land use designations.** Second, the County does not agree that its villages equate to “urbanized cores.” Although the County of San Diego is located in the proximity of an urbanized metropolitan area, the communities within the unincorporated County are distinctly not urban. The comment provides no supporting detail or evidence that potential impacts are not addressed. The DEIR has been prepared to comprehensively address impacts associated with the proposed project.

S1-7 The AG expresses the opinion that the County’s approach seems counterintuitive to reducing GHG emissions. The County does not agree with this comment. **Concentrating future growth in existing villages** has a greater potential for reduced vehicle trips compared to dispersing the growth throughout the currently undeveloped unincorporated area (which is the approach within the existing General
Plan. The County’s approach provides more homes closer to jobs and services, resulting in overall reduced trip length and greater opportunities for alternative forms of transportation. **Concentrating growth in existing villages also works to revitalize those community centers** so that they better service the surrounding community, thereby reducing the need for travel to other areas of the County. While transit service is limited in the unincorporated area, **some of these villages have been serviced in the past and they are the most likely location for any future service.** A more compact village also lends itself to the possibility of localized transit services such as neighborhood shuttle in the future.

S1-8 The comment suggests that instead of reducing VMT as the County intends, concentrating development in the Villages may result in the opposite effect, becoming “commuter communities” reliant on other areas for services and jobs. This comment seems to be the result of unfamiliarity with the unincorporated area or the draft General Plan Update. **The comment again makes reference to “new” Villages which is not a proposal of the General Plan Update.** Further, as discussed in the draft General Plan Update, the existing communities in the unincorporated County are already “commuter communities” and are expected to continue to rely on automobiles as their primary form of transportation. **What the General Plan Update strives to do is to provide the residents of the unincorporated County with more transportation options, more jobs and services within their communities, and more housing options close to those jobs and services.** It appears that the study the AG refers to is a San Francisco/Bay Area study that looked at an extremely urbanized core and its surrounding area. Such a study is not applicable to the rural communities of the unincorporated area. Additionally, the General Plan Update does not propose the same type of job growth addressed by that study or what seems to be referred to by the AG. Industrial and commercial land use designations in the unincorporated area are primarily focused on accommodating services that support the surrounding communities. They are not intended to create major employment centers that are typical of the incorporated cities.

S1-9 The comment states that the County GHG Inventory concludes that it cannot quantify the GHG reductions associated with the Village approach. This is correct. In order to partially quantify the effects of this approach, the traffic network would have to have been modeled based on a dispersed land use pattern. Such an analysis was conducted for the existing General Plan but because that existing plan contains greater capacity, a direct comparison for this purpose would not be appropriate. Additionally, SANDAG has indicated that its traffic model is not as sensitive to smart planning techniques such as location of homes closer to jobs. SANDAG is currently working on improving its model in anticipation of the next Regional Transportation Plan (RTP), but due to past customization of the model for the General Plan Update, those improvements will not be available for this analysis. However, they will be available for the RTP and preparation of the County’s Sustainable Communities Strategy which will be based on the General Plan Update. Another method for demonstrating GHG reductions with the Village approach would be from reduced average daily traffic (ADT) trips for dwelling units within walking distance from town centers. However, there are few studies available that focus on ADT reduction from improved walkability. Therefore, the General Plan Update traffic study conservatively does not account for reductions. The AG states the opinion that there is insufficient evidence to support the concept that the Village approach will lead to lower VMT. The County acknowledges that the growth it is planning with the General Plan Update will result in additional total VMT. Estimated additional VMT are included in the DEIR. However, the County’s position is that growth in the [existing] Villages where it is closer to jobs, services and shopping will be less than if it occurred outside the Villages. There is no requirement that the DEIR quantify this difference. The DEIR has provided those analyses necessary to comply with CEQA and no evidence is provided by the AG that a feasible alternative exists for accommodating the County’s growth with lesser VMT than proposed. Additionally, the DEIR demonstrates that the General Plan Update will achieve significant reductions in VMT compared to the County’s existing General Plan. In DEIR Appendix G: Traffic and Circulation Assessment, Table 4.2, Daily Vehicle Miles of Travel, shows that the proposed project will reduce the total daily VMT for the unincorporated County by more
than three million miles (28,378,464 for the existing General Plan, as compared to 25,370,890 for the proposed project).

(end of excerpts)
Slovick, Mark

From: Carranza, Patricia V. on behalf of Wardlaw, Mark
Sent: Monday, November 02, 2015 9:18 AM
To: Slovick, Mark; Lacey, Cara; Bray, Kelly; McGee, Conor; Witt, William; Mead, Mark
Cc: Gretler, Darren M
Subject: FW: Lilac Hills project not suitable for location

FYI.

From: PAMELA SLATER-PRICE [mailto:pcslater@mac.com]
Sent: Saturday, October 31, 2015 4:18 PM
To: Don/Sheila Cameron
Cc: George Courser; bonnie; Patsy Fritz; Mark Jackson; laelmontgomery@aol.com; sofar; Sara Wan; Kathy Van Ness; Van Santee; Jack Shu; Jana Clark; Karen Binns; Debbie H; david grubb; Mike Bullock; cndixon@hotmail.com; Harry Jensen; Nicole Capretz; James Gordon; Henry Ervin; Harry Jones; Alison St John; Oliver Smith; Wardlaw, Mark; Gretler, Darren M; Matt O'Malley; Everett DeLano
Subject: Re: Lilac Hills project not suitable for location

HAH! Don't count on it unless it's wrapped in $$$$$$

Sent from my beautiful iPhone 6

On Oct 31, 2015, at 4:13 PM, Don/Sheila Cameron <donhcameron@cox.net> wrote:

Thank you for forwarding this article, George. And Congrats to the League of Women Voters! I seldom see them take a strong stand on any issue, so I am impressed. This should carry weight with the Board of Supervisors.

Sheila

From: George Courser
Sent: Friday, October 30, 2015 5:41 PM
To: bonnie ; Patsy Fritz ; Pamela Slater-Price ; Mark Jackson ; laelmontgomery@aol.com ; sofar ; Sara Wan ; Kathy Van Ness ; Van Santee ; Jack Shu ; Jana Clark ; Karen Binns ; Debbie H ; david grubb ; Mike Bullock ; cndixon@hotmail.com ; Harry Jensen ; Sheila S Cameron ; Nicole Capretz ; James Gordon ; Henry Ervin ; Harry Jones ; Alison St John ; Oliver Smith ; mark Wardlaw ; Darren Gretler ; Matt O'Malley ; Everett DeLano
Subject: Lilac Hills project not suitable for location

• Opinion
• Commentary

Lilac Hills project not suitable for location
The proposed Lilac Hills Ranch project consists of 1,746 dwelling units on 608 acres and is not consistent with the existing General Plan land-use designations of semi-rural and rural residential. This project requires a General Plan amendment and changes to the Valley Center and Bonsall Community Plans, which both planning groups voted against. This project also seeks to rezone what is now predominantly agricultural land. The county’s General Plan incorporates smart growth and land planning principles intended to reduce vehicle miles traveled, thus reducing greenhouse gases, by locating future development within and near existing infrastructure. The General Plan prohibits leapfrog development, except for new LEED Neighborhood Development (LEED-ND) certified villages. A LEED-ND prerequisite stipulates development be sited in a smart location with existing infrastructure, nearby multimodal public transit, job availability and public services, thus precluding this project, located 45 miles from San Diego. The county planners have attempted to bypass the LEED-ND standard with a so-called “equivalent” which is not equal. The first prerequisite for the planning-based LEED-ND is location. Since this project cannot meet that prerequisite, the developer has been allowed to substitute the construction-based National Green Building Standard (NGBS), which was developed by the building industry. No city or county in the state of California has adopted this standard. It is not equivalent to LEED-ND.

The county previously concluded that this project could result in adverse physical environmental effects due to growth inducement, potentially further impacting visual resources, air quality, biological resources, cultural resources and noise. The application of a spurious standard, such as the NGBS, does not make this development acceptable.

Recently, Supervisor Bill Horn requested advice on the Lilac Hills project from officials with the state’s Fair Political Practices Commission. Apparently, Horn did not like their answer when they stated he had a conflict of interest and must recuse himself. Horn’s refusal to accept the very advice that he sought undermines public trust in government.

The League of Women Voters supports principles of compact growth, enforcement of fire-safe development and believes in safeguarding valuable agricultural land, a limited resource. We support the minimization of urban sprawl and strive to maintain established patterns of growth and community identity by allowing self-determination in community planning and decision making. We review major development projects with regional impacts. Land-use decisions should relate to and protect the overall quality of the environment while minimizing additional motor vehicle traffic.

The League of Women Voters expects transparency from our county planners and the Board of Supervisors. We believe that this project is not suitable for this location. We urge them to adhere to the principles and guidelines of the General Plan and deny this project.

Brown, Greene and Feathers are with the League of Women Voters.
I live in Valley Center and worked with the County on the 20-20 Plan. We have had developers working with our community for many years conforming with this plan for our community growth. Lilac Hills Developers want to take cheap farming land and develop it outside the plan. If you amend the plan for them, it will be an injustice to those who developed, agreed to and approved the plan. **It will be an injustice to our community.** I am against you voting for the changes to San Diego's agreed upon growth plan. Karen Burstein 12810 Anthony Lane, Valley Center.
September 25, 2018

TO: Chairwoman Kristin Gaspar
    Vice-Chairwoman Dianne Jacob
    Supervisor Greg Cox
    Supervisor Ron Roberts
    Supervisor Bill Horn

FROM: DAVID HALL
      Clerk of the Board of Supervisors

Attached, for your information, is correspondence from Andrew Smisek regarding Lilac Hills Ranch Project.

Thank you.

Respectfully submitted,

[Signature]

DAVID HALL
Clerk of the Board of Supervisors

Attachment

cc: Helen Robbins-Meyer, Chief Administrative Officer
    Sarah Aghassi, Deputy Chief Administrative Officer, Land Use & Environment Group
    Communications Received

DCH:dl
Hello,

My name is Andrew Smisek and I am a resident of Ramona. I would like to express how troubled I am by the "new" proposed Lilac Hills Ranch Project. It is effectively the same project that was rejected 64%-36% by a bipartisan majority of the County voters in 2016. It seem like you should respect the will of the voters and not approve this project when it comes before the board of supervisors. This project is still a bad idea because it is unwise to continue building out into undeveloped areas where wildfire is such a huge risk. Also, this project would have major impacts on the natural resources of this area and diminish the habitat value of the surrounding area. We are lucky to have such diverse and treasured habitats and plant and wildlife species in San Diego County. We can find ways to increase the amount of housing, especially affordable housing, in our area without compromising our local natural areas. Thank you for your attention on this issue and the time you've spent on it. I hope you will make the right choice.

Andrew
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farmland for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Cameron Curry

Escondido 92026
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Matt Kuhn

Escondido, ca 92026
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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places. What is the point of spending many years and taxpayer dollars to develop & agree on a General Plan if you are open to a General Plan Amendment just FOUR years after setting those guidelines in place?

Stop the urban sprawl into the last remaining pockets of rural & semi-rural lands in San Diego. This is the wrong kind of development in the wrong place.

Sincerely,
N.L. Ely

N. L. Ely

Escondido 92025
To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Donna Bird

Escondido 92027
From: Gail Eager [mailto:gmeager@roadrunner.com]
Sent: Friday, October 16, 2015 10:27 AM
To: Cox, Greg
Subject: Lilac Hills

Supervisor Cox:

Please vote **NO** on the proposed Lilac Hills development in the North County. We need to preserve the rural character of this area by controlling growth. Already I-15 has major congestion during the rush hour in this area, and there are no plans to add more lanes.

Thank you,

Gail Eager
Fallbrook
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Patrick King

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Sincerely,

Patricia Kast

Escondido 92027
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Sincerely,

Gail Gosser

Escondido 92027
From: Sue Johnson [mailto:Suejohnson@gmail.com]
Sent: Friday, October 16, 2015 2:30 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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Sincerely,

Sue Johnson

Escondido Ca
October 14, 2015

Supervisor Bill Horn  
County Administration Center  
1600 Pacific Highway  
San Diego, CA 92101

Lilac Hills Ranch & Recusal

Supervisor Horn,

I have read the FPPC 2015-10-13 ruling that forcefully articulates the clear conflict of interest in which you have placed yourself vis-à-vis the Lilac Hills affair.

Under both state and county law, it is even the appearance of conflict that must be avoided. All conduct by elected officials must be directed towards ensuring the trust of the public in its elected officials and the government over which they preside.

You deliberately took personal action that to put you clearly in a conflict of interest; violating that intent; that trust.

Worse, you have subsequently condemned the FPPC ruling as “over each by the state”; as an “attack on the Constitution”!

You, sir, have brought shame on the entire Board of Supervisors; let alone upon those you proclaim as your “local” constituents. By your intentional actions and your post-FPPC ruling diatribe you have brought shame upon the entire voting public of San Diego County.

You, sir, should now be honorable and resign your seat on the Board of Supervisors.

George Barnett

(619) 659-0345 
BigG88882@cox.net
2194 Paseo Donito 
Alpine, CA 91901

CC: Clerk of the Board of Supervisors for distribution to all BOS members
Clerk of the BOS
County Admin Center
1600 Pacific Hwy
San Diego 92101
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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Carleen Powell

Escondido 92027
From: rsanchez@gmail.com
Sent: Sunday, October 18, 2015 7:21 PM
To: Cox, Greg
Subject: Lilac Hills - please vote NO

Below was submitted to greg.cox@sdcounty.ca.gov From rsanchez@gmail.com On 10/18/2015 AT 7:20:34 PM

Name: Roger Sanchez
Address: 4401 Anthony Lane
Email Address: rsanchez@gmail.com
Subject: Lilac Hills - please vote NO
Comments:

It's just too much for our area - please represent the people and not Bill Horn - vote no and stand for the people!
To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Sally Parker

Escondido 92027
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Sincerely,

Susan Alves
Escondido 92027
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Sincerely,

Anatoli Nareshni

Escondido 92027
COUNTY SUPERVISORS:

Please vote NO!

This is a GROSS VIOLATION OF THE GENERAL PLAN AND ZONING LAWS AND SETS A VERY DANGEROUS PRECEDENT TO DO ANYTHING OTHER THAN DENY THIS PROJECT. YOU KNOW THIS ALREADY.

PUSH THE PAUSE BUTTON AND RE-EVALUATE PLEASE!!! 😊
Rampant development and ruthless destruction of green open spaces far from mass transit and work areas makes no sense any longer when we are aiming as a modern society, in the face of global warming, climate action planning, and greenhouse gas reduction targets, to achieve some reasonable reduction in our carbon footprints in San Diego, California and the USA.

Further, while we are still coming to grips with what could be a 40-year drought (Scientific America August 25, 2015 edition) in California and San Diego, to permit the watering of the ground for development and subsequent construction, new living quarters, seems unsustainable until we can, at a minimum, see our depleted water tables and water storage facilities including reservoirs return to more normal levels.

Today’s planning and land use requires new thinking and now! Now is the time to push the pause button (no growth moratorium, just a pause...), digest the situation at hand, allow the environment to recover and make responsible and reasonable development decisions in our county that will enable current and future populations and businesses to survive in San Diego County.

Adding more people, more cars, boosting water use, asking current water customers to let their gardens die so new ones can be planted, to us makes little sense!!! Not now, please.

These are tough times and require a paradigm change in leadership and decision making. Thank you for your consideration of what the General Plan stands for, not modifying it for Lilac Hills, and for voting against this development.

Sincerely,

John and Elena Thompson

Encinitas, CA. 92024

760-436-4399

*P.S. Our county needs investment in infrastructure before we continue to develop and grow, if we are to be successful at it at all!*

2020
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Sincerely,

Denise van Doorn

Escondido 92027
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Sincerely,

**Tom Rogers**

Valley Center 92028
From: Diante Colton [mailto:Dcolton@gmail.com]
Sent: Sunday, October 18, 2015 7:29 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Diane Colton

Valley Center 92028
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Sincerely,

Edwin van Doorn

Escondido 92027
From: Cox, Greg
Sent: Monday, October 19, 2015 12:08 PM
To: De La Rosa, Michael
Cc: FGG-DL, LSDOCS
Subject: FW: Lilac Hills Vote Will Test Supes' Commitment to General Plan

From: Don Wood [mailto:dwood8@cox.net]
Sent: Monday, October 19, 2015 11:57 AM
To: Don Wood
Subject: Lilac Hills Vote Will Test Supes' Commitment to General Plan

http://www.voiceofsandiego.org/topics/opinion/lilac-hills-vote-will-test-supervisors-commitment-to-the-general-plan-heres-hoping-they-pass/?utm_source=Voice+of+San+Diego+Master+List&utm_campaign=4d58d55b74-Morning+Report&utm_medium=email&utm_term=0_c2357fd0a3-4d58d55b74-84036177&goal=0_c2357fd0a3-4d58d55b74-84036177
From: Tom Williams [mailto:Twilliams57@gmail.com]
Sent: Monday, October 19, 2015 12:41 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Fallbrook 92028
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Sincerely,

Edith Huffman

Lemon Grove 91945
-----Original Message-----
From: cherie@premier-event-planning.com [mailto:cherie@premier-event-planning.com]
Sent: Tuesday, October 20, 2015 9:57 AM
To: Cox, Greg
Subject: Smart Growth

Below was submitted to greg.cox@sdcounty.ca.gov From cherie@premier-event-planning.com On 10/20/2015 AT 9:56:52 AM

Name: Cherie Graves

Address: 2797 Vistamonte Glen, Escondido, CA 92027

Email Address: cherie@premier-event-planning.com

Subject: Smart Growth

Comments:

To the Honorable Greg Cox:

I am writing to respectfully ask you to deny the Lilac Hills Ranch (LHR) project and other similar urban sprawl and anti-smart growth developments.

Both my husband and I are native San Diegans and we have two small children. We bought our forever home in San Pasqual five years ago with plans to raise our family, retire and grow old here. Unfortunately, with all of the proposed developments popping up, including the proposed Safari Highlands Ranch project that would destroy the rural nature and charm of our community, go completely against the city’s smart growth strategy and lead to the Los Angelization of San Diego. As a native I’ve always LOVED my city and was proud to say I was a native. I’ve always disliked LA, but we’re just becoming an extension of Los Angeles and continuing to expand into the rural outskirts of San Diego will just make it worse. I-15 is already bad, but adding thousands of homes that will require thousands of daily trips on our already congested highways is definitely NOT the solution. I had to take the 78 across a couple of weeks ago on an OFF-PEAK hour and it was bumper to bumper cars. How does adding thousands of homes that will have to traverse this area help our county?

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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 are the foundation of the General Plan. Plans that go completely against the General Plan and require amendments should be required to be voted on by the people, not placed in the hands of a few politicians – who often have something to gain from these decisions.

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

Sincerely,

Cherie Graves
From: Cherie Graves [mailto:Cherie@premier-event-planning.com]
Sent: Tuesday, October 20, 2015 9:58 AM
To: Cox, Greg
Subject: Smart Growth

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Both my husband and I are native San Diegans and we have two small children. We bought our forever home in San Pasqual five years ago with plans to raise our family, retire and grow old here. Unfortunately, with all of the proposed developments popping up, including the proposed Safari Highlands Ranch project that would destroy the rural nature and charm of our community, go completely against the city’s smart growth strategy and lead to the Los Angelization of San Diego. As a native I’ve always LOVED my city and was proud to say I was a native. I’ve always disliked LA, but we’re just becoming an extension of Los Angeles and continuing to expand into the rural outskirts of San Diego will just make it worse. I-15 is already bad, but adding thousands of homes that will require thousands of daily trips on our already congested highways is definitely NOT the solution. I had to take the 78 across a couple of weeks ago on an OFF-PEAK hour and it was bumper to bumper cars. How does adding thousands of homes that will have to traverse this area help our county?

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San Diego County spent 13 years and $18.6 million to develop a General Plan that meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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 are the foundation of the General Plan. Plans that go completely against the General Plan and require amendments should be required to be voted on by the people, not placed in the hands of a few politicians – who often have something to gain from these decisions.

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

Sincerely,

Cherie Graves
San Diego County Board of Supervisor, Greg Cox 10-20-2015

Dear Board of Supervisors except Bill Horn,

My Board of Supervisor representative, Bill Horn, is not representing me. He is representing Accretive Development in supporting the Lilac Hills Project.

I have been a resident in the immediate neighborhood of the proposed Lilac Hills Project for 27 years. I have been following this proposal for several years and have attended many meetings where the public can voice their opinion of the project including a meeting in front of the Board of Supervisors. I have talked with many residents in the area over the years and I have not met one who supports this project. The people who live in the area of this proposed project are adamantly and overwhelmingly opposed to the Lilac Hills Project.

At meetings before the Planning Commission there seemed to be many supporters to the project but these people were bussed in by Accretive. The buses were parked in the parking lot. I have questioned many of these people and they do not live in the neighborhood and are uninformed of the details of the project. It seems that they are Accretive lobbyists made to appear as residents supporting the project. This is done to mislead the Planning Commission.

I feel that our legislative process is failing me and my neighbors as our elected official, Bill Horn, is not representing us but representing a rich and influential developer who will make millions at the expense of us.
In desperation, I appeal to you to support the residents whose lives will be most impacted by this project and vote to deny this project that violates the General Plan.

Thank you for considering my request.

Larry Stainbrook
Dear Board of Supervisor, Greg Cox

RE: West Lilac Hills Development

Don’t turn West Lilac into a Temecula. There are only two freeway ramps within 2.5 miles and 3 ramps within 6.5 miles. The freeway system is already overcrowded with stopped and slow traffic in between Highway 78 and Old 395 exits. The majority of traffic will probably be working south of Lilac Hills, which would include at least a 20 mile drive to the closest urban area, 50 if driving to downtown San Diego. If they worked north, they would probably move to Temecula, Murietta or housing in Riverside County, since it provides more inexpensive housing than Lilac Hills, with support services already in place.

I’m sure the developer has stated the extra tax dollars that the County will get with this development and the additional jobs, etc. Well, yes, it will probably bring in tax dollars, but will it be enough dollars to bring the additional services needed for the increased population. Will the increase tax dollars be able to set up and support an effective mass transportation system? An additional freeway entrance? An addition to the fire services? Is the developer going to pay for these services? No. The developer will build this development and then allow the County or the State to pay for any additional services that are finally provided. The developer will make the money, the taxpayers will pay for the necessary updates needed to support Lilac Hills.

Why is senior housing being planned in an area that is at least 20 miles from the nearest hospital or medical offices? Does this make sense to anyone but the developer? Why does it make sense to the Planning Commission or to Mr. Horn.

I moved out for the rural environment. I lived in Jamul from 1961 through 1971, and wanted to move to an area much like it was. Jamul still does not have this kind of major development.
Does the Board of Supervisors or the Planning Commission care that the majority of people who attend the Planning Commission meetings in support of the development do not live in the neighborhood, they are from San Marcos, Fallbrook and other areas not directly effected by the development. Why are they there? Who benefits most by their attending and supporting Accretive’s Lilac Hills development?

Why are the drastic changes to the County-approved General Plan being considered? Why is Lilac Hills Project being considered?

Please see that the majority of people in this area do not want this development and it is not advantageous for the County. Please vote against this project.

Thank you.

Evie Stainbrook
From: Don Wood [mailto:dwood8@cox.net]
Sent: Tuesday, October 20, 2015 2:01 PM
To: Don Wood
Subject: Bill Horn conflict of Interest letter
October 19, 2015

Via E-Mail

Mr. Thomas Montgomery  
County Counsel  
County of San Diego  
1600 Pacific Highway  
San Diego, CA 92101  
thomas.montgomery@sdcounty.ca.gov

Re: Supervisor Bill Horn’s Conflict of Interest With Regard to  
Lilac Hills Ranch

Dear Mr. Montgomery:

This firm represents the Cleveland National Forest Foundation (“CNFF”) on matters related to the Lilac Hills Ranch project (“Project”). I am writing to urge the County, and Supervisor Horn, to abide by the Fair Political Practices Commission’s (“FPPC”) recent advice letter, which unequivocally advised Supervisor Horn that “you have a conflict of interest in decisions involving the Project and you must recuse yourself from participating in these decisions.”

I understand that Supervisor Horn does not like the advice he received in response to his request. According to his public statements, Supervisor Horn claims to be concerned that the FPPC advice chips away at democracy, disenfranchises his constituents, and will cause virtually every Board of Supervisors decision to be questioned and overturned. I also understand that he may—with apparent County support—ask the FPPC to reconsider its advice in light of alleged new facts.

Supervisor Horn’s concerns have no basis in reality. Likewise, there is no reason for the FPPC to provide different advice based on “new facts” that I believe Supervisor Horn may provide. I urge you to advise Supervisor Horn to recuse himself from all discussions and decisions concerning the Lilac Hills Ranch Project. In addition, if Supervisor Horn writes to the FPPC to seek new advice, I request that your advise him
to include all relevant information concerning the development potential of his property. If he withholds relevant facts from the FPPC and obtains advice based on those incomplete facts, the County could be exposed to liability if a County resident later files a complaint with the FPPC or brings suit to overturn a Board decision in which Supervisor Horn wrongly participated. See Government Code § 91003(a), (b).

The Narrowly Drawn FPPC Advice Letter Protects Public Trust and Upholds Democracy.

In public statements, Supervisor Horn has called the FPPC advice letter “outrageous” and a “clear case of state overreach.” He claims it undermines democracy and “chip[s] away at the foundation of what we as Americans believe.” He even claims that Board members will no longer be able to vote on any land use projects under this broad precedent. Nothing could be further from the truth.

First, the FPPC’s advice letter does not undermine democracy; on the contrary, it protects public faith in our democratic government. In 1974, California voters passed an initiative that enacted the California Political Reform Act. The objectives of the law—to inform the electorate and prevent corruption of the political process—are carried out in part by the FPPC, which is a non-partisan, objective agency. It is far preferable to have an impartial agency such as the FPPC decide whether public officials have a conflict of interest rather than leave it to each official to decide for himself. One can hardly expect Supervisor Horn or any other official to have an unbiased view regarding their own interests. This is the purpose of the FPPC, and it has carried out its duties admirably in this instance.

Second, the advice letter is not overly broad, but is narrowly tailored. The FPPC recognized that Supervisor Horn owns nearly 37 acres of land located just 1.3 miles from the proposed Lilac Hills Ranch development. It described how this proposed project would “add 1,746 dwelling units and 90,000 square feet of retail and commercial space... a K-8 school, public and private parks, [] other recreational amenities, as well as recycling and water reclamation facilities.” The huge project and its infrastructure improvements “would also likely change the development potential and the income producing potential of nearby or surrounding real property.”

Far from implying that all Supervisors will be barred from voting on any new developments in their districts, the advice letter carefully describes why this particular project, in this particular location, creates a conflict of interest for Supervisor Horn. It states that “[t]here are currently very few housing tracts within the Valley
Center community, and few retail and commercial developments. The Project, with 1,746 dwelling units and 90,000 square feet of retail and commercial space, would be by far the largest, and among the densest developments in the Valley Center area.” It even contrasts the situation with other proposed developments that include only 207 – 366 units.

There is no reason for Supervisor Horn or the County to be alarmed at the FPPC’s advice, which provides a narrow, fact-based analysis of Supervisor Horn’s particular situation in this instance. The FPPC nowhere implies that other Supervisors in other situations will also have to recuse themselves in decisions involving smaller developments, or developments in more built-up areas. Likewise, the situation might be different if a Supervisor merely owned a home nearby a proposed development, and did not own developable land, as Supervisor Horn does. In any event, Supervisors concerned about potential conflicts in the future may always seek the FPPC’s advice, as Supervisor Horn did here.

**Supervisor Horn’s Property Is Highly Developable.**

Supervisor Horn claims that the Lilac Hills Ranch project cannot increase the value of his property because it is currently under a Williamson Act contract and contains many steep, allegedly undevelopable slopes. While it is true that his land is currently protected by a Williamson Act contract, the FPPC has already described why this fact is not relevant. Specifically, such contracts are subject to termination, which would allow Supervisor Horn or successors in interest to develop the property.

Notably, the County’s environmental impact report for the Lilac Hills Ranch project states that the project is slated to take at least ten years to develop. Thus, the Williamson Act contract could expire just as the project is being built out and the surrounding land becomes more profitable for development. In addition, developers often “bank” land even if it is not currently developable. Thus, approval of the project would immediately increase the value of Supervisor Horn’s property, even if it could not be developed for a number of years.

The topography of Supervisor Horn’s property also does not preclude it from being developed. His land used to be zoned to allow 1 housing unit per 10 acres, but was recently upzoned to allow 1 unit per 2 acres. The maximum yield on his property is therefore 18 units. Although Supervisor Horn claims that steep slopes would prevent him from developing his land (he does not say whether it would prevent all development or just some development), this is incorrect. The County recently adopted a Conservation
Subdivision Ordinance that allows landowners such as Supervisor Horn to achieve the maximum development potential of their land by clustering new homes on smaller lots while protecting steep slopes and agricultural land on the rest of the property.

The County’s website explains how its Conservation Subdivision Program:

- reduces otherwise applicable lot size and design restrictions,
- “allow[s] additional encroachment within steep slopes when projects sufficiently conserve other sensitive lands,”
- allows for Planned Residential Developments, which “allow for reductions in lot size and other design restrictions when a certain percentage of open space is provided,”
- allows for “lot area averaging[, which] allows for flexibility in lot sizes provided the overall density is maintained”

Last, it is noteworthy that Supervisor Horn and the County have previously acted under the belief that his property is developable and that he must abstain from participating in, or voting on, decisions that may affect the development potential of his property. In 2003, Supervisor Horn recused himself from considering and voting on changing the zoning of his property to SR-2 designation, and thereby allowing greater development. There would have been no need for this recusal if steep slopes on his property prevented the rezoning from actually allowing greater development on Supervisor Horn’s parcels. Evidence of this recusal is attached as Exhibit A.

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1 See generally http://www.sandiegocounty.gov/pds/advance/conservationsubdivision.html (explaining Conservation Subdivision Program)

2 See http://www.sandiegocounty.gov/pds/advance/conservationsubdivision.html; see also Resource Protection Ordinance, § 86.604(e)(2)(cc) (“Additional encroachment into steep slopes may be permitted for tentative maps and tentative parcel maps which propose a Planned Residential Development, lot area averaging, conservation subdivision or cluster development when design considerations include encroachment into steep slopes in order to avoid impacts to significant environmental resources that cannot be avoided by other means.”).
In conclusion, there is no basis for Supervisor Horn to ask the FPPC to reconsider its advice that he has a disqualifying conflict of interest with regard to the Lilac Hills Ranch development. But if Supervisor Horn requests new advice, it is imperative that he present accurate and complete information to the FPPC regarding the development potential of his property. His failure to do so would undermine public trust, subvert our democratic system, and expose himself and the County to liability.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Erin B. Chalmers

cc: Supervisor Bill Horn
    William Witt, Deputy County Counsel
    Hyla P. Wagner, FPPC General Counsel
    Emelyn Rodriguez, FPPC Senior Commission Counsel

Exhibits:
A) County Board of Supervisors Statement of Proceedings, Wednesday, May 21, 2003

717272.1
From: Kelly Keebler [mailto:saleslady1000@outlook.com]
Sent: Tuesday, October 20, 2015 7:40 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overpowers the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Kelly Keebler

Valley Center 92082
From: Lisa Cherico [mailto:lisac@klinc.com]
Sent: Wednesday, September 30, 2015 4:01 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

The developers want to build a "village destination", none of the residents who have already purchased homes, and paid taxes in this area want to live in a village, if we did we would have moved to Carlsbad or San Marcos. I personally purchased a home in Fallbrook for the RURAL lifestyle.

Additionally, the areas of Fallbrook and Valley Center already do not have enough water, power, roads, fire fighters etc. I do not understand how the board can approve a project of this magnitude, while at the same time the State is constantly telling residents we do not have enough resources for the existing homes.

Please consider the people in the area, and our quality of life. If this project is as the developers claim, good for the existing community, please ask them to put it on the ballot.

Sincerely
Lisa Cherico

Sincerely,

Lisa Cherico

Fallbrook 92028
To the Honorable San Diego Board of Supervisors:

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

The board of supervisors approved the current general plan and I see no reason to grant special favors & exemptions for deviations from this general plan.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs. As you are aware, building where there is no infrastructure just increases the cost of housing in order to provide the necessities of life. This will not make for "affordable" housing!

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.
Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.

The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Kristi Davis

Escondido 92026-5915
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:29 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Linda Camp [mailto:trailpaloma@yahoo.com]  
Sent: Wednesday, September 30, 2015 4:04 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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Sincerely,

Linda Camp

escondido 92026
From: Darin Pines [mailto:darin@calplant.com]
Sent: Wednesday, September 30, 2015 4:06 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

**Darin Pines**

Valley Center 92028
From: Avina, Victor
Sent: Friday, October 23, 2015 3:29 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Karen Langer Baker [mailto:karenlangerbaker@gmail.com]
Sent: Wednesday, September 30, 2015 4:09 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Karen Langer Baker

Fallbrook 92028
From: Allan Brassard [mailto:AllanBrassard@me.com]
Sent: Wednesday, September 30, 2015 4:34 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Allan Brassard

Bonsall 92003
To the San Diego Board of Supervisors:

We are writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

Our family has lived in this area for 18 years and we enjoy the rural surroundings. Our belief has always been it would remain protected in some way due to the guidelines of the County General Plan. Now we find ourselves defending the very document that was created to stop this type of expansion.

While we understand the need for growth there is also the need to properly control that growth. Areas such as Lilac Hills fall completely outside of that plan. Building such a large scale development in an area that has nothing like this now will completely destroy it. This is NOT planned and controlled growth.

Lastly we as a family have a concern for our safety in the event of a wildfire. The Lilac bridge is only so wide and to the best of our knowledge can not easily be widened. During the last wildfires in the area West Lilac Rd was completely gridlocked. We can not imagine adding possibly 5000 or more people in the area and having anyone think we could evacuate safely.

Please follow the General Plan and put this project out of scope as it should be.

Thank you,

The Martino's

Gary Martino

Escondido 92026
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

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

Sincerely,

Jennifer Lindley

Valley Center 92082
From: Kathe Robbins [mailto:katherobbins@gmail.com]
Sent: Wednesday, September 30, 2015 4:55 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

I am writing to respectfully ask you to deny the Lilac Hills Ranch (LHR) project for the following reasons: We have a general plan that needs to be followed. Look to the Sprinter corridor in San Marcos, with housing being developed along transportation lines. We need to develop more transit opportunities and follow that with housing.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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Sincerely,

Kathe Robbins

San Marcos 92069
To the Honorable San Diego Board of Supervisors:

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

The traffic on our current roads are HORRENDOUS NOW! I can't imagine how long the lines will be coming down Circle R Drive to Highway 395. The current wait during the week is between 10 and 30 cars. What will it be like with more homes here! Even with a traffic light it will be a very crowded condition. It is easy for someone not living here to think all is well. I ask each of the Supervisors to come out here and stand at the Fire Station at Circle R Drive at 7:00 am to 8:00 am and see what it is like. You may think you are too busy, but your vote is important and you valuable time will be well served to spend just one hour seeing what we see every day. PLEASE!

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

Also, ignoring the general plan, in this instance, is UNNECESSARY. There is adequate land available in the county to satisfy all the growth needed. Isn't that why you had a General Plan in the first place!

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

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Sincerely,

Hal Helfand

Escondido 92026
From: Alan Miller [mailto:Alanmillercabinets@gmail.com]
Sent: Wednesday, September 30, 2015 4:22 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

**Alan Miller**

Bonsall 92003
From: Linda M Nelson [mailto:linda@ginelson.com]
Sent: Wednesday, September 30, 2015 4:17 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

My husband and I retired 4 years ago. We moved to our wonderful home in Circle R Estates that unfortunately is adjacent to the proposed LHR proposed development. We took all of our retirement housing monies to purchase a property at a bank sale, after looking for our perfect house for over 2 years. There was no disclosure that the pastoral private road (Mountain Ridge) would be hi-jacked and used by a developer who’s only interest is making money. This is a private road only used by the less than 25 homes in this immediate area. LHR would make it a public road with hundreds of trips using it per day. This road is also our only means of ingress and egress on a daily basis and in the event of a wild fire. There is no honest means of a safe way of exiting on this road nor Circle R with the primary means of exiting the area. It would be a disaster and possible death for many people who could be trapped here.

Every day that we sit on our patio and listen to the "quiet", we marvel at the peace and tranquility this area gives us.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.
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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Linda M Nelson

Escondido 92026
From: Dan Dakovich [mailto:dddakovich@gmail.com]
Sent: Wednesday, September 30, 2015 4:20 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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Sincerely,

Dan Dakovich

Fallbrook 92028
From: Betty Prue [mailto:hotrodbetty92082@yahoo.com]
Sent: Wednesday, September 30, 2015 4:26 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Betty Prue

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

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

My wife and I retired 4 years ago. We moved to our wonderful home in Circle R Estates that unfortunately is adjacent to the proposed LHR proposed development. We took all of our retirement housing monies to purchase a property at a bank sale, after looking for our perfect house for over 2 years. There was no disclosure that the pastoral private road (Mountain Ridge) would be hi-jacked and used by a developer who's only interest is making money. This is a private road only used by the less than 25 homes in this immediate area. LHR would make it a public road with hundreds of trips using it per day. This road is also our only means of ingress and egress on a daily basis and in the event of a wild fire. There is no honest means of a safe way of exiting on this road nor Circle R with is the primary means of exiting the area. It would be a disaster and possible death for many people who could be trapped here.

Every day that we sit on our patio and listen to the "quiet", we marvel at the peace and tranquility this area gives us. This would all be ruined by the proposed LHR development. We are not anti growth. We are pro smart growth in areas that can handle the effects of such growth. This area does not meet that criteria.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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Sincerely,

Gary W Nelson

Escondido 92026
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Sincerely,

Maureen Gupta

Bonsall 92003
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Sincerely,

Thomas D Camp

Escondido 92026
From: margaret duganski [mailto:mduganski@gmail.com]
Sent: Wednesday, September 30, 2015 4:11 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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Sincerely,

margaret duganski

fallbrook 92028
From: Debby Siebert [mailto:dsiebert874@gmail.com]
Sent: Wednesday, September 30, 2015 4:29 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

**Debby Siebert**

San Marcos 92069
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Sincerely,

Michael Karp

Valley Center 92082
From: Avina, Victor
Sent: Friday, October 23, 2015 3:30 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: George & Patti Gregoroff [mailto:ggregoroff@hotmail.com]
Sent: Wednesday, September 30, 2015 5:09 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

**George & Patti Gregoroff**

ESCONDIDO 92026
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:30 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Darlene Dakovich  
Sent: Wednesday, September 30, 2015 5:20 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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Sincerely,

Darlene Dakovich

Fallbrook 92028
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:30 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: James Horn [mailto:jlc2008@gmail.com]  
Sent: Wednesday, September 30, 2015 5:52 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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Sincerely,

James Horn

Valley Center 92082
From: Avina, Victor
Sent: Friday, October 23, 2015 3:30 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Carey Kennedy [mailto:ckennedy4100@gmail.com]
Sent: Wednesday, September 30, 2015 5:52 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Sincerely,

Carey Kennedy

Fallbrook 92028
From: Florence Griffis [mailto:flovang@gmail.com]
Sent: Wednesday, September 30, 2015 5:55 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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I have evacuated 3 times from wild fires in Valley Center and my current location. I pack up early and leave before official notice to do so. I am 82 years old and this gets harder each time. Imagine former city people faced with smoke and flames trying to get out - Chaos! Don't create an area with a wall of fire from which to escape. Having more people on the roads is not going to make it easier. Think!

Even one of the Planning Commissioners said if he lived in this area, he would not be in favor of it! (so why did he vote yes and let us all face disaster?)

Sincerely, Florence Griffis

Florence Griffis

Escondido 92026
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Sincerely,

Greg and Christine Brady

Escondido 92026
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:30 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Lynn Horn [mailto:lhvd2008@gmail.com]  
Sent: Wednesday, September 30, 2015 5:57 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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Lynn Horn

Valley Center 92082
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Sincerely,

Hans Haas

Valley Center 92082
From: Robert Marnett [mailto:marnett1@att.net]
Sent: Wednesday, September 30, 2015 7:47 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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I live one mile from the proposed development just off West Lilac. There is no way the narrow two lane roads to the proposed development could ever safely handle the traffic generated by 1600 residences. West Lilac to the city of Bonsall and Hwy 395 to Hwy 76 cannot be widened without a multi-million dollar effort that the builder is unwilling to pay for. I have already seen two deaths at the West Lilac and Hwy 395 intersection in the last 4 years from my back yard. That figure could easily quadruple with the LHR development and you will be directly responsible for those deaths.

Additionally, increased crime will inevitably result from a such a high density development.

And finally, I spent a long time finding the perfect place to retire away from LA and Orange counties where I previously lived. The LHR project will destroy the quiet rural life I tried so hard to find for my wife and myself.

Please reject the LHR development and keep the original zoning for those parcels.

Thank you,

Robert Marnett

Bonsall 92003
From: Debra Mirr [mailto:debramirr@gmail.com]  
Sent: Wednesday, September 30, 2015 8:53 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Debra Mirr

Bonsall 92003
From: Avina, Victor
Sent: Friday, October 23, 2015 3:30 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Diane O'Toole [mailto:d botoole@yahoo.com]
Sent: Wednesday, September 30, 2015 9:29 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Diane O'Toole

Escondido 92026
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Sincerely,

Rose Van Driessche

Valley Center 92082
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:30 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Johan Pettersen [mailto:yoanddo@aol.com]  
Sent: Wednesday, September 30, 2015 9:37 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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Sincerely,

Johan Pettersen

Fallbrook 92028
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:30 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: John Turner [mailto:Pa-uma@hotmail.com]  
Sent: Wednesday, September 30, 2015 9:46 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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John Turner

Valley center 92083
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:30 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: patricia borchmann [mailto:patriciaborchmann@gmail.com]  
Sent: Wednesday, September 30, 2015 9:47 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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You Supervisors of SD County were elected, to represent constituents and families in your District. Voters in your District are asking you to show how your actions 'earn' interest on the promises every single Supervisor made during election campaigns.
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Thank you for thoughtful consideration of views of many, who find there is much to love about retaining 'rural' density, views, physical separation, and quality of life in Valley Center, without this new Village for Lilac Hills Ranch.

Sincerely,

patricia borchmann

escondido 92026
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Mary Belton

Fallbrook 92028
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Sincerely,

Melinda Sparks

fallbrook 92028
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Sincerely,

**Lucinda Lawton**

Valley Center 92082
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Sincerely,

Laura Glusha

Escondido 92025
To the Honorable San Diego Board of Supervisors:

I am heartsick and seriously concerned as I have watched the evolution of the Lilac Hills Ranch project develop. It is apparent that this project was orchestrated by Accretive Developers with the support of the Planning Commission staff and a number of the Planning Commission members. Why did the San Diego spend countless hours and millions of dollars on community general plans and a law that prohibits leapfrog development to a short time later amend general plans and use an "equivalent" loophole to approve the Lilac Hills Ranch development? It not only flies in the face of what is rational and conscionable, it makes a mockery of the process and the politicians that support this and similar developments.

San Diego County spent 13 years and $18.6 million to develop a General Plan that meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved. I live on one of the two evacuation roads from Valley Center and the proposed Lilac Hills project. It is difficult to exit onto Circle R Drive now as it is. One can only imagine what it will be like with an additional 1700 homes a mile up the road, not to mention in an evacuation situation on a two-lane road with one land reserved for emergency vehicle use.

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Elizabeth Aragon
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The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Karla Carroll

El Cajon 92021
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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

Sincerely,

Kelly Metten

Kelly Metten

fallbrook 92028
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

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Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places. In addition, supervisors with a proximity to the proposed development having the appearance of a conflict of interest because of changes to their land values or other concerns, should recuse themselves from voting on said project’s approval.

Sincerely,

Lyn Townsend

Escondido 92026
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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

Sincerely,
Susan L. Moore
Resident of Valley Center over 30 years.

Susan Moore
Valley Center 92082
From: [mailto:jonmeller@msn.com]
Sent: Thursday, October 01, 2015 10:44 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We cannot realistically build a new community without the resources to serve and protect such a community. There is no industry to count on, the lack of schools, water, fire control, traffic control, Hospitals, medical care, and safe development of services are the key reasons. Roads are not wide enough, traffic patterns will be difficult. Services such as grocery and all other services are limited in availability and expected growth of such services is neither guaranteed nor sustainable.

You cannot justify adding such density without an over whelming rationale, beyond the singular act of giving a developer the ability to see development. Developers move on the the next project and often times similar situation are not sustainable. There are many such examples up and down the California Valleys. I am thinking of similar development in the Central Valley and Las Vegas. The long term situation drives down housing value and drives up absentee ownership, with marginal investment return.

However the most critical limitation is natural resources. Where is the water to come from? Will there be something about these developments that assures water service and availability and infrastructure over time? How about green space, and how to maintain it?
What about utility services and sustainability and safety? Where is the power going to come from?

We already have enough, more than enough extra capacity approved. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.
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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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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 are the foundation of the General Plan.

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

Sincerely,

**jonathan heller**

Valley Center 92082
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:31 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Lee Schwarz [mailto:schwarzano@gmail.com]  
Sent: Thursday, October 01, 2015 11:18 AM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and 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,

Lee Schwarz

PS- No need to modify this letter in any way. It says it all

**Lee Schwarz**

Valley Center 92082
From: Jim Schwarz [mailto:jim.r.schwarz@gmail.com]
Sent: Thursday, October 01, 2015 11:19 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

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

Sincerely,

Jim Schwarz

Valley Center 92082
From: Patricia Fouquet [mailto:prfouquet@gmail.com]
Sent: Thursday, October 01, 2015 1:04 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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Furthermore, in the event of a catastrophic fire, the evacuation of Lilac Hills Ranch, if it were built fully, would overwhelm the efforts to evacuate of all the people who live in the present rural areas to the west. The fire danger ALONE must be addressed if there is to be any further development up in this location. Roads adequate for evacuation must be built before any further homes are constructed up here!

Sincerely,

**Patricia Fouquet**

Bonsall 92003
From: Avina, Victor
Sent: Friday, October 23, 2015 3:31 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Michael Bullock [mailto:mike_bullock@earthlink.net]
Sent: Thursday, October 01, 2015 1:05 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

The County needs to develop a Climate Action Plan that achieves climate-stabilizing targets with current zoning (if possible) and enforceable measures. With all the driving that this project would induce, it's approval would make it much harder to develop the CAP that is needed.

We do not need to destroy farmland for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.
Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.

The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Michael Bullock

Oceanside 92054
From: Richard Belton [mailto:Beltoffr@gmail.com]
Sent: Thursday, October 01, 2015 1:15 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

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Sincerely,

Richard Belton

Fallbrook 92028
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Katherine Fontenot

Escondido 92026
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

It is irresponsible to approve exceptions to the General Plan when you have not even come up with a Climate Change Plan. Increasing road traffic and water consumption is foolish.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

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Sincerely,

Joy Frew

Fallbrook 92028
From: Michele Glemsen [mailto:wdwine@gmail.com]
Sent: Thursday, October 01, 2015 2:36 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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Sincerely,

Michele Glemser

Fallbrook 92028
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Sincerely,

**Gregory MIrr**

BONSALL 92003
From: jeff johnson [mailto:bravepads@yahoo.com]
Sent: Thursday, October 01, 2015 3:01 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

In closing, in respect to those "voices" from other San Diegans that this project would not affect, they are only concerned with convenience. Convenience of nearer markets, amenities, etc. Their self fulfilling opinions should not be given any credence when making the decision for our community.

Sincerely,

Jeff Johnson

jeff johnson

VC 92026
From: Peter Peneyres [mailto:avofarmer2000@yahoo.com]  
Sent: Thursday, October 01, 2015 3:36 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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Sincerely,

Peter Penseyres

Peter Penseyres

Oceanside 90257
From:  anne marie nelson [mailto:annemarien@wildblue.net]
Sent: Thursday, October 01, 2015 5:23 PM 
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

anne marie nelson

valley center 92082
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Sincerely,

Suzy Sandore

Escondido 92025
From: Tonya Saliba [mailto:TSalivaRn@gmail.com]
Sent: Thursday, October 01, 2015 9:28 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Tonya Saliba

Fallbrook 92028
From: Eric DeMasi [mailto:lattapasta@gmail.com]
Sent: Friday, October 02, 2015 4:45 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Eric DeMasi

Fallbrook, Ca. (2028)
From: Carolyn Kurtz [mailto:Carolynstardust@gmail.com]
Sent: Friday, October 02, 2015 10:23 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Carolyn Kurtz

Valley Center 92082
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Sincerely,

Suzanne Martindale

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

I am writing to ask that you deny the Lilac Hills Ranch (LHR) project for the following reasons, because it is such a violation of the planning guidelines that took so much work, money and time to establish. This project makes a mockery of democracy. Money wins the Board of Supervisors is what we all will learn if you pass this.

Colin Kurtz

Valley Center 92082
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Sincerely,

Tammy Granados

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Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission's recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

jacquelyn rae

Fallbrook 92028
From: Leon Schwartz [mailto:vcleon1@yahoo.com]
Sent: Friday, October 02, 2015 8:00 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan. I worked for years on GP 2020 and other plans with the County and strongly believe that the County should not allow any modifications at this time to the General Plan. If they did other developments would also ask.

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

Sincerely,

Leon Schwartz

Valley Center 92082
From: susan janisch [mailto:socaljj@cts.com]
Sent: Saturday, October 03, 2015 8:52 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

The 2011 GENERAL PLAN accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements. We should not destroy farm land for more housing.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs (GENERAL PLAN).

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to PUBLIC SAFETY and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.

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 are the foundation of the GENERAL PLAN.

PLEASE: Build village densities in established Villages. UPHOLD THE GENERAL PLAN.

Sincerely,

Sue Janisch
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
WHERE ARE YOU GETTING THE WATER FOR THIS HUGE DEVELOPMENT.

The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Nancy Wright

FALLBROOK 92028
From: Rena Hamilton [mailto:avorena1@yahoo.com]
Sent: Saturday, October 03, 2015 9:06 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and 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 are the foundation of the General Plan.

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

Sincerely,

**Rena Hamilton**

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

Where is all the water coming from?

Traffic is already bad.

How many more schools will be needed?

Sincerely,

Barbara Zink

Bonsall 92003
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

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

Sincerely,

karenlee Robinson

San Diego 92107
From: Lisa Taunt [mailto:pdnhed@gmail.com]
Sent: Saturday, October 03, 2015 9:51 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Lisa Taunt

Fallbrook 92028
From: Kathy Hodge [mailto:kathleenhodge64@gmail.com]
Sent: Saturday, October 03, 2015 11:34 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

The proposed project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. This project is a hazard to public safety and should not be approved since a fire driven by Santa Ana winds would be able to destroy the area in one hour.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.

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

Sincerely,

**Kathy Hodge**

Escondido 92026
To the Honorable Save Our San Diego Countryside:

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

I am a retired Firefighter from San Diego City and have a huge concern regarding fire service if this project goes in.

The current fire stations in this area are spread thin as it is. If or should I say when a major fire rolls through this area it will be very difficult to evacuate the residents that live here now with the roads the way they are. Their proposed "road improvements" will not help this situation. Adding these new dwellings, vehicles and people with this proposed project will complicate the above scenario. This is not the area for this proposed plan. I truly believe this could result in tragic loss of life in a major fire evacuation situation. It is your responsibility to insure safety for all in this area, I wouldn't want to be in your shoes if lives are lost as a result of approving this project.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and
generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.

The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Jan Shuttleworth

Escondido 92026
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:32 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Elisabeth Gruwell [mailto:sublimesbetfan@aol.com]  
Sent: Sunday, October 04, 2015 10:19 AM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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

Sincerely,

Elisabeth Gruwell

Valley Cetner 92082
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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Sincerely,

Chad Gruwell

Valley Center, 92082
From: Laura Martino [mailto:lpmartino710@gmail.com]
Sent: Sunday, October 04, 2015 11:01 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher

Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

We should not build village densities in rural places. San Diego County spent 13 YEARS of research and 18.6 MILLION DOLLARS to develop a General Plan that meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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

Sincerely,
Laura P. Martino
West Lilac Road Homeowner since 1997

Laura Martino
Escondido 92026
From: Avina, Victor
Sent: Friday, October 23, 2015 3:32 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Ann Howard [mailto:cannhoward@aol.com]
Sent: Sunday, October 04, 2015 1:10 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

Deny Lilac Hills Ranch! It will be a disaster...do you want this as your legacy? The communities affected by this betrayal of trust that North County residents have in our officials will not be forgotten.

Goodson is a liar, none of his promises will happen, or it will take decades to fulfill with other's capital. Those who have spoken in favor of this project have some monetary gain connected to it. This is not fair to existing residents of the community, punishing them for the benefit of a developer, who has a bad reputation.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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Sincerely,

Ann Howard

Valley Center 92082
From: Avina, Victor
Sent: Friday, October 23, 2015 3:32 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Victoria Laurie [mailto:aardvarksvil@gmail.com]
Sent: Sunday, October 04, 2015 11:12 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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Sincerely,

Victoria Laurie

valley center 92082
To the Honorable San Diego Board of Supervisors:

I am writing to respectfully ask you to deny the Lilac Hills Ranch (LHR) project for the following reasons as well as the fact that, as a resident of the area in question and being familiar with the roads, it is unbelievable to me that such a dangerous idea is even been entertained. Anyone who knows the area is aware that putting in a project of this nature is inviting disaster.

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Sincerely,

Debbie Groyer

Escondido 92026
From: Tyler Alvarez [mailto:TylerEZ@yahoo.com]
Sent: Sunday, October 04, 2015 5:57 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Tyler Alvarez

Vista 92084
To theHonorable San Diego Board of Supervisors:

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Sincerely,

Addie Brassard

Bonsall CA 92003
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Sincerely,

Jean White

Fallbrook 92028
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:33 PM  
To: FGG-DL, LSOCS  
Subject: FW: Save Our San Diego Countryside

From: Anna Di Nardo [mailto:aztecperliteanna@yahoo.com]  
Sent: Wednesday, October 07, 2015 12:07 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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Please leave our little town alone!

Sincerely,

Anna Di Nardo

Anna Di Nardo

Pauma Valley 92061
From: Avina, Victor
Sent: Friday, October 23, 2015 3:33 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: janet crawford [mailto:jetclaus@hotmail.com]
Sent: Wednesday, October 07, 2015 5:25 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

janet crawford

Bonsall 92003
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Bonsall 92003
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:33 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside  

From: karen Koppenahver [mailto:karenkafi@aol.com]  
Sent: Thursday, October 08, 2015 2:32 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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karen Koppenahver

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Steve Sevigny

FALLBROOK 920288820
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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Isabella sevigny

Fallbrook 92028
To the Honorable San Diego Board of Supervisors:

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The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved. Please DO NOT put our lives at risk by approving this project. Mr. Horn, I do not know what your motivation is to approve this project, but you could get caught in the inevitable chaos of a possible evacuation effort as well as the rest of us. Make a decision that is responsible to your constituents, not in favor of a developer. You have a responsibility to the tax paying citizens of San Diego County and Valley Center to recuse yourself from this vote because of an obvious conflict of interest. This project defies logic and smart planning. I personally challenge you to explain to the public why you are in
favor of a project that will destroy our General Plan and plunge the county into court battles that will cost even more tax payer money. How in the name of Jesus can you justify such an irresponsible decision? If you do not recuse yourself from this vote and vote in favor of this project, then I call for your immediate resignation from office on the grounds that you will have disgraced yourself and used your office for personal gain. This is so obvious to everyone, it is wonder you can live with yourself!

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Sincerely,

Dirk Jones

Escondido 92026
From: Marlene Pompetti [mailto:mbpompetti@gmail.com]
Sent: Saturday, October 10, 2015 9:29 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Marlene Pompetti

Escondido 92026
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Sincerely,

Dan Miller

El Cajon 92022
From: nancy_maples [mailto:nancy_maples@hotmail.com]
Sent: Monday, October 12, 2015 9:20 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

nancy maples

Carlsbad 92011
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:33 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Megan Lipps [mailto:megan.lipps@gmail.com]  
Sent: Wednesday, October 14, 2015 5:57 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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Sincerely,

Megan Lipps

Escondido 92027
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Sincerely,

Derek Wilson

Escondido 92027
From: Sally Vogt [mailto:sryphoto@yahoo.com]
Sent: Wednesday, October 14, 2015 6:27 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

I AM OPPOSED TO LILAC HILLS RANCH

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Sincerely,
Sally Vogt

Sally Vogt
Escondido 92027
From: Scott Wahl [mailto:swahl5467@gmail.com]
Sent: Wednesday, October 14, 2015 9:38 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Scott Wahl

Escondido 92027
From: Avina, Victor  
Sent: Friday, October 23, 2015 3:33 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Thomas Pillsworth [mailto:tpills@aol.com]  
Sent: Wednesday, October 14, 2015 9:53 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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Sincerely,

**Thomas Pillsworth**

ESCONDIDO 920276929
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Charles Telfer

Escondido 92027
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Christine Rideout

Escondido 92027
From: Brian Wagner [mailto:wagnerindy@sbcglobal.net]
Sent: Thursday, October 15, 2015 12:39 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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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 are the foundation of the General Plan. Why have a General Plan if you are going to blow holes through it?

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

Sincerely,

Brian C. Wagner

**Brian Wagner**

Escondido 92027
From: Catherine Konyn [mailto:catherinek@nhcare.org]
Sent: Thursday, October 15, 2015 12:39 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Sincerely,

Catherine Konyn

Escondido 92027
From: Lisa Martinez [mailto:voyager11@rocketmail.com]
Sent: Thursday, October 15, 2015 2:36 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Lisa Martinez

Escondido 92027
From: Catherine Cornick Walker [mailto:Ccornick@cox.net]
Sent: Thursday, October 15, 2015 3:37 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Sincerely,

Rebecca Nutile

Escondido 92027
From: Rebecca Nutile [mailto:rnutile@gmail.com]
Sent: Thursday, October 15, 2015 3:44 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Rebecca Nutile

Escondido 92027
From: Avina, Victor
Sent: Friday, October 23, 2015 3:34 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Maribeth Plunk [mailto:Mfplunk@cox.net]
Sent: Thursday, October 15, 2015 4:22 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Sincerely,

Maribeth Plunk

Escondido 92029
From: Cameron Curry [mailto:cameronmcurry@gmail.com]
Sent: Thursday, October 15, 2015 9:17 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Sincerely,

Cameron Curry

Escondido 92026
From: Matt Kuhn [mailto:Mattkuhn@rocketmail.com]
Sent: Thursday, October 15, 2015 11:02 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Sincerely,

Matt Kuhn

Escondido, ca 92026
From: N. L. Ely [mailto:Neyssa76@hotmail.com]
Sent: Friday, October 16, 2015 9:15 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Stop the urban sprawl into the last remaining pockets of rural & semi-rural lands in San Diego. This is the wrong kind of development in the wrong place.

Sincerely,
N.L. Ely

N. L. Ely

Escondido 92025
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Sincerely,

Donna Bird

Escondido 92027
From: Patrick King [mailto:patrickjking@hotmail.com]
Sent: Friday, October 16, 2015 10:29 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Patrick King

Escondido 92027
From: Patricia Kast [mailto:Pattykast@yahoo.com]
Sent: Friday, October 16, 2015 11:46 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Gail Gosser

Escondido 92027
From: Sue Johnson [mailto:Suejohnson@gmail.com]
Sent: Friday, October 16, 2015 2:30 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Sue Johnson

Escondido Ca
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Carleen Powell

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Sincerely,

Sally Parker

Escondido 92027
From: Avina, Victor
Sent: Friday, October 23, 2015 3:34 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Susan Alves [mailto:jp4healthsca@sbcglobal.net]
Sent: Friday, October 16, 2015 5:24 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Sincerely,

Anatoli Nareshni

Escondido 92027
From: Denise van Doorn [mailto:obwhan@co.net]
Sent: Saturday, October 17, 2015 10:35 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Denise van Doorn

Escondido 92027
From: Tom Rogers [mailto:trogers@aol.com]
Sent: Sunday, October 18, 2015 7:28 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Tom Rogers

Valley Center 92028
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Edwin van Doorn

Escondido 92027
From: Tom Williams [mailto:Twilliams57@gmail.com]
Sent: Monday, October 19, 2015 12:41 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

**Tom Williams**

Fallbrook 92028
From: Edith Huffman [mailto:edith.huffman@gmail.com]
Sent: Tuesday, October 20, 2015 8:50 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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

Sincerely,

**Edith Huffman**

Lemon Grove 91945
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and 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,

Kelly Keebler

Valley Center 92082
-----Original Message-----
From: Ron-Roberts
Sent: Thursday, October 01, 2015 4:15 PM
To: Avina, Victor
Subject: FW: Contact Me Form

-----Original Message-----
From: no-reply@sdcounty.ca.gov [mailto:no-reply@sdcounty.ca.gov]
Sent: Thursday, October 01, 2015 11:12 AM
To: Ron-Roberts
Subject: Contact Me Form

The information below was submitted on 10/1/2015 11:11:54 AM.

Subject: Lilac Hills

Name: Sally Parker

Email Address: saleslady1000@outlook.com

Address: 1477 Anthony Lane

City: Valley Center

State: CA

Zip: 92082

Phone Number: (xxx) xxx - xxxx

Message: My husband and I ask that you vote NO on this development. I work in Temecula and travel the 15. Morning and evening traffic is horrible and 1800 home will make it impossible to get anywhere. Please stand up for the residents in Valley Center and vote NO.

---------------------------------------------------------------
Dear Supervisor Roberts,

As an elected representative, you are charged with representing the will of the people of San Diego County, who have already spoken loudly and clearly on the Lilac Hills Project via the General Plan Update which San Diego County spent 13 years and $18.6 million to develop. Via that plan, your constituents very clearly said “No” to building dense housing in rural areas; and said “No” to leapfrog development such as this project which is essentially creating an entirely new city in North County. In fact, this project flouts just about every major principle in the General Plan regarding back-country development.

In addition to the views already clearly expressed by your constituents — i.e., the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update — which you cannot ignore, this project has other serious problems that make its approval untenable, including:

1) We do not need this housing. We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing—72,683 new dwellings—and fully meets Regional Housing Need Allocation (RHNA) requirements. In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

2) Severe health and safety concerns alone make this project a non-starter, especially now. First, in the midst of an historic drought, only the foolhardy would approve building any more homes anywhere, especially in Valley Center which is now burdened with draconian water use reduction quotas. We are now living beyond our water means; adding more residents is shockingly irresponsible — unless and until we have excess water to devote to them. Second, the drought only increases an already enormous fire risk. This project is in a high fire danger area — where the fire risk is now exacerbated by the drought — and where our fire fighters now struggle to respond in a timely manner to the threats to already-existing homes and residents. The Applicant’s own consultants state that Lilac Hills Ranch will take two hours
to evacuate. Fire modeling indicates that a Santa Ana wind-driven fire will burn through the project in an hour. In addition, the roads cannot accommodate a mass exodus of this many additional residents. The risk of extensive property damage and even deaths is extremely high with this proposal. These severe health and safety concerns represent a liability that no County official should countenance.

(3) This project’s problems are both severe and insurmountable. Forever ruining over 600 acres of farmland; adding many thousands of new residents and their perpetual water consumption; increasing the human and structure density in a wildfire-prone area; ignoring the basic premises of the General Plan; and creating a new city, far from support services are just a few of the severe negative impacts that are inherent in this project. The only mitigation available for these negative impacts is denial of the project.

Your vote must represent the views of those you are elected to represent. Thus, you must respect the general Plan Update and reject the Lilac Hills Project and ensure that medium/high density is only allowed in established Villages. DENY any General Plan Amendment that drops urban islands into rural places, including the Lilac Hills Project.

Sincerely,
MCraggs
Valley Center CA
-----Original Message-----
From: Estrada, Jeannette On Behalf Of Ron-Roberts
Sent: Wednesday, October 14, 2015 2:25 PM
To: Avina, Victor
Subject: FW: Contact Me Form

Victor,

Sending to you as an FYI

-----Original Message-----
From: no-reply@sdcounty.ca.gov
Sent: Wednesday, October 14, 2015 2:00 PM
To: Ron-Roberts
Subject: Contact Me Form

The information below was submitted on 10/14/2015 1:59:35 PM.

Subject: Lilac Hills

Name: J. Napier

Email Address: j7no00@gmail.com

Address: 1624 Loring Street

City: San Diego

State: CA

Zip: 92109

Phone Number: (858).483.2359

Message: I hope you will vote against the Lilac Hills development. We already have more people than we can provide for. No one needs or wants that development except those who will make a ton of money from it. Sincerely, J Napier
-----Original Message-----
From: Ron-Roberts
Sent: Tuesday, October 20, 2015 9:51 AM
To: Avina, Victor
Subject: FW: Contact Me Form

-----Original Message-----
From: no-reply@sdcountry.ca.gov [mailto:no-reply@sdcountry.ca.gov]
Sent: Tuesday, October 20, 2015 9:51:16 AM
To: Ron-Roberts
Subject: Contact Me Form

The information below was submitted on 10/20/2015 9:51:16 AM.

Subject: Urban Sprawl and Smart Growth

Name: Cherie Graves

Email Address: cherie@premier-event-planning.com

Address: 2797 Vistamonte Glen

City: Escondido

State: CA

Zip: 92027

Phone Number: 760-755-7143

Message: To the Honorable Ron Roberts

I am writing to respectfully ask you to deny the Lilac Hills Ranch (LHR) project and other similar urban sprawl and anti-smart growth developments.

Both my husband and I are native San Diegans and we have two small children. We bought our forever home in San Pasqual five years ago with plans to raise our family, retire and grow old here. Unfortunately, with all of the proposed developments popping up, including the proposed Safari Highlands Ranch project that would destroy the rural nature
and charm of our community, go completely against the cities smart growth strategy and lead to the Los Angelization of San Diego. As a native I've always LOVED my city and was proud to say I was a native. I've always disliked LA, but we’re just becoming an extension of Los Angeles and continuing to expand into the rural outskirts of San Diego will just make it worse. I-15 is already bad, but adding thousands of homes that will require thousands of daily trips on our already congested highways is definitely NOT the solution. I had to take the 78 across a couple of weeks ago on an OFF-PEAK hour and it was bumper to bumper cars. How does adding thousands of homes that will have to traverse this area help our county?

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements. We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

San Diego County spent 13 years and $18.6 million to develop a General Plan that meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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 are the foundation of the General Plan. Plans that go completely against the General Plan and require amendments should be required to be voted on by the people, not placed in the hands of a few politicians – who often have something to gain from these decisions.

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

Sincerely,

Cherie Graves

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-----Original Message-----
From: Ron-Roberts
Sent: Wednesday, October 21, 2015 9:57 AM
To: Avina, Victor
Subject: FW: Contact Me Form

FYI-

-----Original Message-----
From: no-reply@sdcounty.ca.gov [mailto:no-reply@sdcounty.ca.gov]
Sent: Tuesday, October 20, 2015 5:01 PM
To: Ron-Roberts
Subject: Contact Me Form

The information below was submitted on 10/20/2015 5:00:58 PM.

Subject: Lilac Hills Ranch

Name: Peter Watry

Email Address: p.watry@cox.net

Address: 81 Second Avenue

City: Chula Vista

State: CA

Zip: 91910

Phone Number: (xxx) xxx - xxxx

Message: I hope you will NOT vote to approve the Lilac Hills Ranch project. I live in Chula Vista, one of the fastest growing cities in the U. S., much less San Diego County. I believe a few rural areas ought to be left as such, and Valley Center is such a lovely example.

Thank you,

Peter Watry
-----Original Message-----
From: Ron-Roberts
Sent: Thursday, October 22, 2015 12:16 PM
To: Avina, Victor
Subject: FW: Contact Me Form

FYI-

-----Original Message-----
From: no-reply@sdcountry.ca.gov [mailto:no-reply@sdcountry.ca.gov]
Sent: Thursday, October 22, 2015 10:39 AM
To: Ron-Roberts
Subject: Contact Me Form

The information below was submitted on 10/22/2015 10:39:22 AM.

Subject: Vote NO on Lilac Hills

Name: Brent Priest

Email Address: bpriest@aol.com

Address: 23704 Cool Valley Road

City: Valley Center

State: CA

Zip: 92028

Phone Number: (xxx) xxx - xxxx

Message: Vote NO - it's just too much....too big and will big many, many problems to north county. Please vote NO.
Dear San Diego County Board of Supervisors,

Thank you all for your hard work year to date!

I am writing to you to urge you to Vote No on the Lilac Hills Development and take the lead in smart well placed urban planning. The County's General Plan in place to protect the land and guarantee sound planning, decision making as our leaders. The General Plan serves to guide development and limit growth in the wrong (illogical) places. It seems to me there would be no waiver or variance available for the proposed Lilac Hills Ranch if we are to stay true to the intent of the General Plan --- regardless of any claims made to the contrary by the developer or the Building Industry Association. Please vote no and uphold the County's General Plan.

These are tough times and require a paradigm change in leadership and decision making. Thank you for your consideration of what the General Plan stands for, not modifying it for Lilac Hills, and for voting against this development.

Thank you,

Carris Rhodes and Joshua Sherman

Encinitas, CA

760.688.8275

Sent from my iPad
To the Honorable San Diego Board of Supervisors:

I am a resident of West Lilac Road, and I am writing to respectfully request that you to deny the Lilac Hills Ranch (LHR) project for the following reasons:

My family relocated to this community over 17 years ago to pursue our dreams of growing fruit crops and nursery plants, just like many of our neighbors. This community was designed for rural country living and we do not need to destroy or precious farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements. The General Plan was designed to protect and promote smart growth for all of the communities of San Diego County and was not intended to be simply disregarded just so that developers and contractors can profit from their lavish projects.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range. These projects will follow the General Plan and will be placed in areas where proper infrastructure exists or has been planned. Lilac Hills Ranch does not follow the General Plan and proper infrastructure does not exist and is not planned.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise. There will be no jobs created by this project that can sustain the required income to support living in this community, thus more commuters will be added to our roads. Current residents travel to either San Diego or Riverside Counties for their employment and their commute is at least an hour each way, as there is no transit system in North County. The only school buses in our community take our children to Fallbrook High, which is an hour commute and is over 10 miles away. Children attending Sullivan Middle School or Bonsall Elementary requires the parents to drive them to school as buses are not available.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services. We
currently only have one gas station that is over 3 miles away on Highway 76 and is already over crowded. Our next nearest station is located in Bonsall or at Deer Springs, which is over 8 miles away. Shopping for reasonably priced groceries is over 13 miles away in Fallbrook or Escondido, which will result in added commuting.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads. The Lilac bridge is only two lanes wide and cannot be widened to accommodate the increased traffic that this project would bring. This project would add another 3,000 commuters to our already highly traveled roads. Old Highway 395 frequently becomes over burdened with traffic when the 15 freeway is impacted by an accident or wildfire. Road closures due to our recent 2014 fire resulted in residents becoming panicked when they were not able to access or leave their property as commuters were unfamiliar with the roads and the direction that they needed to take to get out of the way of danger. This project and its density would certainly result in added danger to both our current and future residents.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should NOT BE APPROVED.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements. My property and all of my neighbors property would be impacted by eminent domain if West Lilac Road is widened to the north of the current road. Our septic and leach fields would not be functional or meet the minimum 100 % legal required reserve. The Lilac Hills Ranch will not have sewer system as it does not exist and therefore they must build a sewage treatment plant. Their plan shows that sewage will be collected and trucked off daily until the treatment plants is built. I currently work near a sewage treatment plant in Temecula and can confirm that the smell and bugs that are a result of this facility is not attractive or desirable to any community. All driveways will be greatly impacted and will require extensive grading both for Road Slope Easement and realignment of our driveways to meet road grade. As a result of these factors, residents will have extended periods of denial of access to our property during construction.

The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan. Uphold the General Plan!

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

Sincerely,

Stephanie Eisenhower

Escondido 92026
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

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Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
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Sincerely,

**Erik Jensen**

Escondido 92027
To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Jill Hasselquist

San Diego 92117
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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

Sincerely,

Erik Jensen

Escondido 92027
Dear County Supervisors,

The folks at Lilac Hill Ranch are sharp and clever. I am sure with enough time, they will find solutions to the roads, fire stations, schools, and the like. The General Plan Planners were however even sharper, more clever and infinity wiser than the folks at Lilac Hills Ranch. The planner correctly realized that not all areas should be densely built on, but rather some areas need to be rural. So those planners set aside areas for different densities. You, the Supervisors, need to see this simple truth: not all areas should be high density. Eighteen million dollars was spend to figure out where to build and where not to build. Please follow the General Plan, the problem is not roads, fire stations or schools, but rather problem is plan growth or not to plan growth...do not get tricked by getting caught up in all the irrelevant details rather see the BIG PICTURE...it is spelled out concisely in the General Plan. By following the General Plan County, not supporting this leap frog development, you will be saving the County countless millions of dollars, because the county will not have to spend millions of unplanned dollars on redeveloping a new sewer system, improving roads, litigating eminent domain issues, and many more items.

The next meeting on this subject need not be hours and hours long. You have the wisdom to know that the General Plan needs to be preserved and therefore Lilac Hill must be rejected. Hours and hours do not need to spent on roads, fire stations, schools and the like, if Lilac Hill is not be allowed to vary from the General Plan. Please vote on issue of development location at the very beginning of the meeting without any discussion of roads, fire stations, schools and the like.

Short and sweet should be the order of the day.

Respectfully,
Erick Vidal
Valley Center
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Erick Vidal
Valley Center
From: John Parrillo [mailto:john.parrillo@gmail.com]
Sent: Monday, October 26, 2015 8:24 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

There is no capacity for the tremendous water resource need.

We do not need to remove farm land and food resources for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

Housing adds to school cost and is net negative tax wise.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.
Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.

The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

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**Kathryn Ellwood**

escondido 92027
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Dallas Keck

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Sincerely,

Suzanne Keck

Escondido 92027
Dear Chairman Horn and Members of the Board:

Please find attached a short opinion editorial from Roger Lewis, President of Citizens Coordinate for Century 3.

The full article and reader comments are available at:

http://www.voiceofsandiego.org/topics/opinion/lilac-hills-vote-will-test-supervisors-commitment-to-the-general-plan-heres-hoping-they-pass/?utm_source=Voice+of+San+Diego+Master+List&utm_campaign=4d58d55b74-Morning_Report&utm_medium=email&utm_term=0_c2357fd0a3-4d58d55b74-84036177&goal=0_c2357fd0a3-4d58d55b74-84036177

Sincerely,

Mark Jackson
760-731-7327
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Sincerely,

WILLIAM WILSON

ESCONDIDO 92027
From: WILLIAM WILSON [mailto:DWILSON200@GMAIL.COM]
Sent: Tuesday, October 27, 2015 4:55 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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George Gowland

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Kathryn Mitchell

ESCONDIDO 920276929
From: Kristen Higgins [mailto:mrs_k_higgins@yahoo.com]
Sent: Wednesday, October 28, 2015 3:57 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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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 are the foundation of the General Plan.

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

Sincerely,

Carla Alvarez

Escondido 92026
From: Ron-Roberts
Sent: Tuesday, September 08, 2015 3:08 PM
To: Avina, Victor
Subject: FW: C-3 LHR Comments letter

From: Roger Lewis [mailto:lewism1@hotmail.com]
Sent: Tuesday, September 08, 2015 1:35 PM
To: Fitzpatrick, Lisa
Cc: Ron-Roberts; Jacob, Dianne; Roberts, Dave; Cox, Greg; Horn, Bill
Subject: C-3 LHR Comments letter

Ms. Fitzpatrick -

Attached are comments from Citizens Coordinate for Century 3, (C-3), submitted to the county's Planning Commission for the commissioner's consideration in preparation for the Sept 11th hearing on Lilac Hills Ranch. These same comments in letter form were submitted to you through the USPS on Saturday.

Please confirm with me your receipt of these comments.

Thank You,

Roger Lewis
President, Citizens coordinate for Century 3
lewism1@hotmail.com
619-563-6094
For over 50 years C-3 has been a prominent and active organization of planning, academic and design professionals advocating for equitable and exemplary planning, design, and governance in the San Diego region. As such we were an interested and active participant in the development and review of the County's General Plan. Our comments herein regarding the Lilac Hills Ranch project result from thoughtful and informed deliberations among a select number of engaged and informed C-3 members with applied expertise in planning, sustainable building, and transportation. Those aspects of the project's design within the site envelope are not a focus of these comments.

Smart growth and sustainability principals are a core component of the recently adopted County General Plan. Specifically, the Plan states that one of its underlying premises is to conserve natural resources and develop lands and infrastructure more sustainably in the future. These principals are reflected as well in the various community plans supportive of the General Plan. Related state legislation such as the Global Warming Solution Act, (AB 32), is referenced in the County’s General Plan and provides metrics to guide and assure the best opportunity for sustainable growth principals and goals to be achieved. It is critical in these early stages of implementation of the General Plan to uphold and adhere to its intent in order to set the proper course and to uphold the integrity of the planning process.

Guiding Principles in the General Plan state an intent to promote environmental stewardship, locate new growth near existing and planned infrastructure, preserve agriculture, maintain environmentally sustainable communities, and reduce greenhouse gas emissions contributing to climate change. The LEED ND criteria address the overall impact of projects both within the site envelope and, critically as well, how it integrates with and enhances its surrounding environment. How Lilac Hills Ranch integrates with the established community of Valley Center regarding environmental edge effects, accessing community and regional services, air quality, and enhancing the "Village Center" are significant aspects of the overall project. The proposed NGBS “equivalency” the county is using in supporting this project is fully deficient in addressing the context of this project outside of its site envelope.
The previous attempt to accommodate this project as part of the general plan update was wisely rejected by the County. The greater level of detail offered by the applicant offers no new information, benefits, or mitigation for the County to reverse that decision.

Approval of the proposed Lilac Hills Ranch development in its current location would severely undermine the smart sustainable growth tenets of the General Plan and subvert its intent for the following reasons:

1) The proposed project is not adjacent to an existing community or existing infrastructure and would result in significantly higher Vehicle Miles Travelled. Accepting the project density stated, it is still significantly below the LEED ND standard to spur development of mass transportation. The resulting increase in GHG emissions is counter to Plan goals and state legislative guidelines. The increased VMT, not accounted for in SANDAG’s Regional Plan, directly conflicts with SANDAG regional plan assumptions for GHG reductions based on adopted general plans, including the County's current General Plan.

2) SANDAG’s public transportation network proposed in its Regional Plan does not extend transit service to this location for the next 30 years. While the county may seek remedy with SANDAG this development alone will not produce enough pressure to spawn public transportation let alone sustain it. Over time another congested new area will be added to the county’s landscape lacking affective transportation alternatives.

3) Public transportation aside, it is impossible to see Lilac Hills Ranch as being anything other than an island community where walking or biking to work or to the Valley Center “village” is non-existent.

4) The siting of this project is counter to the General Plan’s guiding principle of preserving agriculture as an integral component of the region’s economy, character and open space network. Establishing a large urban development within an agricultural region like this greatly increases its susceptibility to crop diseases born by suburban insect pests unintentionally introduced. This invariably will also result in chemicals and pesticides being introduced into the regional environment (soils, water and air). Furthermore, the soil compaction under the development will significantly increase the amount of hardscape within the current agricultural watershed. In spite of best efforts to control runoff, this too will result in the introduction of pesticides, oils, and other chemicals inherent in urban runoff, into the surrounding agricultural region. All of concern as leading, over time, to an area of severely degraded agricultural value.

Amendments should be consistent with the underlying principles of the General Plan, not ways to navigate around them. Overlooking clear contradictions to the core goals of the General and community plans, abetted by the acceptance of an ‘equivalency’ that does not address the critical aspect of the project’s siting, would severely damage the integrity of a planning process the county invested more than 10 years into in adopting the General Plan. The proposed
amendment to facilitate approval of this project is a direct threat to the integrity of the planning process, undermining both the clear intent of the general plan and the role of civic engagement in our region. Furthermore, adopting this proposed amendment sets a dangerous precedent for future development in our County.

This project is simply in the wrong place. C-3 urges you to recommend denial of the proposed plan amendment and associated plans, maps and rezone for the Lilac Hills Ranch project.

We are appreciative again of providing our comments regarding the proposed Lilac Hills Ranch development for your consideration.

Respectfully,

Roger Lewis
President, Citizens Coordinate for Century 3

cc: Hon. Dianne Jacob, Supervisor
    Hon. Ron Roberts, Supervisor
    Hon. Dave Roberts, Supervisor
    Hon. Greg Cox, Supervisor
    Hon. Bill Horn, Supervisor
FW: Lilac Hills Development (North San Diego County)

Vic,

Please hold on to these.

Sal

Salvatore Gianetta
Chief of Staff
Supervisor Ron Roberts
County of San Diego
1600 Pacific Highway, Room 335
San Diego, CA 92101
619 531-5544
619 531-6262 FAX
salvatore.gianetta@sdcounty.ca.gov

Follow Supervisor Ron Roberts at:
To: Ron-Roberts; Ron-Roberts  
Subject: Lilac Hills Development (North San Diego County)  

Based on the recent Planning Commission hearing, one way or another, the Lilac Hills development project is going to end up in front of the Board of Supervisors.  

This project is as bad as, or worse than the original Merriam Mountains project you correctly rejected some years back.  

Please reject Lilac Hills.  

When Merriam Mountains returns to you, please reject it one more time.  

Please keep rejecting projects that are not included in or anticipated by the County’s recently concluded General Plan process. You spent a great deal of time and money on the General Plan. It is a compromise among those who propose urban level development in unincorporated areas that are not already villages, and those opposed.  

The issues between Merriam and Lilac are about the same.  

Lilac Hills is a 1,700 plus home development with ancillary commercial space. Its design is not much different from a typical tract. It does include senior housing and 200 units of assisted living for those suffering dementia. The ancillary commercial development is probably not large enough to attract shoppers, as the area surrounding Lilac Hills is rural and agricultural in nature. The commercial development is probably too small to meet the needs of Lilac Hills residents—so its presence in the project does not make Lilac Hills a "self contained community" or much alter the significant increase in ADT on two tiny, two lane rural roads that will serve the project.  

Lilac Hills is many miles distant from Valley Center. It is more distant from Escondido. It is really far from Fallbrook or Oceanside.  

It is sprawl at its worst.  

Sprawl is not just an aesthetic issue.  

In the case of Lilac Hills, the key problems are:  

1. No existing infrastructure, especially roads. Under the proposed ingress/egress plan, there is no feasible way the senior citizens and dementia sufferers can be evacuated if there is a wildfire. The roads are too narrow to accommodate fire and life safety vehicles at the same time residents are fleeing.  

2. The project is not designed to "shelter in place". Therefore, it may not be feasible to avoid evacuation in a wildfire. If the project were designed to shelter in place, its environmental impacts from vegetation clearance and its additional water demands would not qualify it under standards for green building.  

3. The project replaces agriculture with urban-level development. Therefore it does not qualify under LEED-ND green community standards. Therefore, the NGBS green community label is not the equivalent of a LEED designation. And I think you know that LEED is awarded PRIOR to development and use. There is absolutely no guarantee that a LEED project will actually attain the
levels of conservation forecast when plans are drawn up. Therefore these standards are not as relevant for decision makers as the projections made by consultants in the County's environmental review, and its own assessment of demands the project will make.

4. The project confers no unusual benefit. It is a subdivision masquerading as a planned community. The senior projects are in later phases. There is no evidence of demand for these units at this time, and there will not be greater demand even if the initial single family tract phases of the project succeed. Lilac Hills is too distant from urban centers to support a senior housing project and a dementia facility.

5. The only way this project succeeds, economically, is if it induces further high density residential development in the vicinity.

That is not what is contemplated in the General Plan.

The project should be denied. It does not belong in this part of Valley Center or in Bonsall. It is a cookie cutter subdivision on undersized roads in a rural area.

It defies every objective of the newly adopted General Plan.

Do we need affordable and work-force housing in the unincorporated area?

Yes, in the Villages. Where it belongs.

Not here.

Peter H. St. Clair
2341 Whitman Street
San Diego CA 92103
619-260-1307
A letter received from a constituent for the record.

Victor Avina
Policy Advisor
Supervisor Ron Roberts
County of San Diego
1600 Pacific Highway, Room 335
San Diego, CA 92101
(619) 531-5544
(619) 531-6262 FAX
victor.avina@sdcounty.ca.gov
We are writing this letter to express our OPPOSITION to the proposed Lilac Hills Ranch Development in Bonsall / Valley Center unincorporated area of San Diego County, CA.

As 26 year residents of the Bonsall sphere of influence (Home address 3306 Gopher Canyon Rd. Vista CA. 92084) we believe that we have many relevant concerns about this project:

- The area in question for the proposed project located on West Lilac Road is not currently and never has been zoned for the type of development proposed.
- The infrastructure in the area of the proposed development cannot handle the estimated 1,700 proposed combination of homes, apartments, senior living quarters, light commercial and an elementary school.
- It is estimated that there will be over 7,000 vehicle trips daily from the proposed location onto local roads that were never intended to handle the current traffic. The local roads are two lane, mostly windy roads that often have steep drop offs or banks with no shoulders. All of the local roads have private drive ways that enter from odd angles which creates safety concerns when entering or exiting these driveways. Gopher Canyon Road as an example has gone from approx. 1,000 trips a day to approx. 20,000 trips a day in 26 years!
- Existing roads are not planned to be improved beyond a couple traffic lights (West Lilac & Old 395, Old 395 & Circle R) and a turn lane at the end of Gopher Canyon Rd @ East Vista Way. As noted above these local roads are not adequate for the amount of traffic today let alone the large development that is proposed. Most existing local roads are in fair to poor condition with no County money for upgrades or resurfacing. Noisy, low budget “chip seal” is the best that has been provided for maintenance.
- If this development is allowed to proceed this will undoubtably be the first of many.
- This is a classic “Leap Frog” development. This developer has bought less expensive semi-rural land and is attempting to force a development into a community that does not want it. The residents (including ourselves) bought in this area to get away from the traffic and congestion that a development like this will bring.

26 years ago we built our home in Gopher Canyon – Vista address – Bonsall sphere of influence. Our children attended Bonsall Elementary, Norman Sullivan Middle School and Fallbrook High School. We found our land and built in accordance with the zoning in place. I understand progress (I am in construction industry - 38 years) but not destructive progress as will be the case with this development.

The Bonsall and Valley Center community plans reflect their resident’s commitment to preserving the characteristics of a rural atmosphere. This includes houses generally located far apart and randomly. It includes a common value for tranquil, private, rural life preserving the beauty of natural landforms, features, lack of noise and congestion. The proposed development is 15 times denser than is what it’s currently zoned for, the houses and roads are not random but systematically placed, and the dense population of residents will ensure congestion, noise and visual pollution. This will add immensely to daily commutes as there is no close access to commercial services, employment centers, civic uses that a Village zoning would require. There are surely better suited locations for this type of Village category community.

Please consider our OPPOSITION to the Proposed Lilac Hill Development when voting.

Richard and Lisa Stewart
3306 Gopher Canyon Road
Vista, CA. 92084
(760) 630-3911

[Signature]
Follow Up Flag: Follow up
Flag Status: Completed

From: Don Wood [mailto:dwood8@cox.net]
Sent: Saturday, October 31, 2015 1:53 PM
To: Don Wood
Subject: Lilac Hills Ranch not suitable location for development | SanDiegoUnionTribune.com

Please support the League of Women Voters op-ed with your own voice ... and pass it on!

Life on earth has gone through five major extinction events, and is now going through the sixth, due to human destruction of habitat. The rights of our great-grandchildren to enjoy nature should trump property rights. But, if upheld by you and the other Supervisors, the decision of the San Diego County Planning Commission will mean that the endangered species in the County (home of more endangered species than any other county in the USA,) will soon no longer be endangered, they will be gone, extinct. This decision allowing a development like Lilac Hills will set a precedent that will open up the County to the same old leapfrog development that created Los Angeles. Interests of future generations will be sacrificed on the altar of developer greed. If you care at all about the rights of future generations to enjoy San Diego's wonderfully diverse ecosystems, you will vote no on Lilac Hills.

Sincerely,

Margaret McCown Liles
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Sincerely,

Margaret McCown Liles
-----Original Message-----
From: Ron-Roberts
Sent: Monday, November 16, 2015 11:53 AM
To: Avina, Victor
Subject: FW: Contact Me Form

FYI-

-----Original Message-----
From: no-reply@sdcounty.ca.gov [mailto:no-reply@sdcounty.ca.gov]
Sent: Monday, November 16, 2015 11:29 AM
To: Ron-Roberts
Subject: Contact Me Form

The information below was submitted on 11/16/2015 11:28:58 AM.

Subject: Land Use

Name: Mark Seebach

Email Address: seebachm2@aol.com

Address:

City:

State:

Zip:

Phone Number: (xxx) xxx - xxxx

Message: Dear San Diego County Supervisors, 11/16/2015

As residents of District 5, we are contacting you regarding two proposed housing development projects, (Newland/Sierra & Lilac Hills Ranch). Apparently the corporations behind these projects want us to amend the General Plan so they may either develop or get approval and then “flip” the land for profit.
Our General Plan meets and exceeds future housing needs and took more than 10 years and $18M to create. The American Planning Association recognized this excellence by honoring the Plan with the 2010 National Planning Excellence Award for Comprehensive Planning. "It's not a perfect plan. There is no perfect plan as far as I'm concerned," said County Supervisor Ron Roberts. "But this is a damned good plan."

You have voted on and rejected these proposed developments before. How many times must we tell developers "no means no"? With the "donations" from developers to some San Diego county officials directly, developers' money in the Sherriff's PAC and elsewhere, we once again find ourselves at the mercy of corporations. The developers don't want to play by the rules, so they want to change them.

We strongly urge a "No" vote against these projects and ask any supervisor with property holdings or financial interests that may benefit them, to recuse themselves from voting.

Thank You,
District 5 concerned voters.
From: Avina, Victor
Sent: Wednesday, December 02, 2015 8:03 AM
To: FGG-DL, LSDOCS
Subject: Fwd: Save Our San Diego Countryside

Sent from my iPhone

Begin forwarded message:

From: Ryan Doyle <Rgdoyle86@gmail.com>
Date: December 2, 2015 at 2:00:41 AM PST
To: <greg.cox@sdcouinty.ca.gov>, <michael.delarosa@sdcouinty.ca.gov>,
<dianne.jacob@sdcouinty.ca.gov>, <adam.wilson@sdcouinty.ca.gov>,
<dave.roberts@sdcouinty.ca.gov>, <keith.corry@sdcouinty.ca.gov>,
<ron.roberts@sdcouinty.ca.gov>, <victor.avina@sdcouinty.ca.gov>,
<bill.horn@sdcouinty.ca.gov>, <christopher.livoni@sdcouinty.ca.gov>
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private...
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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Ryan Doyle
San Diego 92109
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Sincerely,

Ryan Doyle

San Diego 92109
From: Christopher Bennett [mailto:cbennett70@aol.com]
Sent: Friday, January 01, 2016 8:12 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

**Christopher Bennett**

Valley Center 92082
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Sincerely,

Cheryl M. Bennett

Valley Center 92082
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Sincerely,

Curtis J. Fehsenfeld

Valley Center 92082
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We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite
road improvements.

The Planning Commission's recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Darlene Ayotte

Valley Center 92082
Planning Commission,

I am writing today to ask you to approve the Lilac Hills development. I have been in support of this smart development for years now. I literally don’t know what else people would want them to do in order for them to agree that it goes way above and beyond all the requirements or suggestions detractors or anyone against it. If a development this smart and checks all county’s recommendations, I tend to think they’re against all development.

And smart development like Lilac Hills is exactly what we need, and everyone knows it. Some just don’t want to admit it.

In summary, please approve Lilac Hills development, especially since the recent upgrades and changes Lilac Hills is doing for fire safety, which checks even more boxes.

Thank you,

Scott Marquart
Hello Ann

My name is Sean Smith and I am a concerned citizen of North County San Diego. My concern is that we may be making bad decisions based on selfishness.

By selfishness I mean what I refer to as “the hypocrisy of North County.” This is the notion that people want the development to stop now that THEY have THEIR house. “Let’s just develop one more tract of land so I can afford to live up there. Ok now stop - enough already!!” It’s really absurd and I hear it all the time. The concerns that drive those sentiments (from those who I hear it from) are around traffic (esp egress in fire), schools, and property values. It’s very difficult to argue that Lilac Hills hasn’t solved for those concerns in spades.

The housing is needed. It just strikes me as really irresponsible to not move forward with this extremely well thought out project. In fact, especially in today’s topsy turvy world, we really need a positive sign of economic strength. Investment pouring into our county’s periphery would be fantastic.

Thanks for taking the time to read all of this. Pardon me for getting a bit lengthy.

Best regards,
Sean

--
Regards,
Sean F. Smith
Dear Sir/Madam; I reviewed new project of Lilac Hill, it is a wonderful project which every one has to look forward to it. I have a property there and I welcome this wonderful project, the first Carbone Free Village in county of San Diego. I welcome the new roads, the school, safe community, a state of the art and safer community. The planning commissioner, the Fire department, the Mayor and all staff working on this project to improve the environment and lives of the people in our community, deserve RECOGNITION by the San Diego County and State of CA. I can imagine how this project will increase County’s income and employment of thousands of people especially at this time of COVID 19 era, which every one needs a job and income. I wish all the best success in implementing this great project. Respectfully Steve G.Rahimi
Dear Planning Commission Chair,

I hope this email finds you well amidst the current crisis of our lifetimes. From health to social justice, it seems humans have had enough. Large masses of people are not receiving what they want, need, and believe is their God given right at the hands of the few. In each of these situations we currently face on a macro scale, a few people in power are doing their best to prevent the rest from achieving equality. Because equality is scary to those sitting at the top. It is scary to think that the best neighborhoods, the best schools, the best hospitals, all the way up to the best state and national governments might have to make room for people of all colors, experiences, income levels, and opinions to fit in alongside. Together. In order to make life better for everyone because we are all created equal.

Lilac Hills Ranch, and some of the issues this dedicated team of folks have faced, can be considered a microcosm of the issues outlined above. A few residents of the area have stood on their pedestal of power for long enough. Many would Thank those "Nimby neighbors" for bringing to the table all of the genuine concerns felt by current members of the region (perhaps unknown to an outside group). As a respectful developer and promising community partner would do, Lilac Hills Ranch listened to these concerns and implemented solutions. Fact: Over $113 million is planned to be invested in community improvements. This is a sign of true progress! This is what America and the world are begging for more case studies of right now.

Are there two opposing sides to an issue? Then bring both groups into the room, identify what needs to be done to satisfy each party, allow some time to make adjustments, reevaluate, and approve to move forward with the new symbiotic approach.

Cheers and thank you!
Steven

--
Steven Kenyon
Cell: 619-884-7838
Email: kenyon.steven@gmail.com
June 10, 2020

VIA EMAIL ONLY

Douglas Barnhart, Planning Commission Chair
Tom Montgomery, Esq., County Counsel
Mark Wardlaw, Planning Director
Mark Slovick, Deputy Director

RE: Ad Hoc Committee Regarding Lilac Hills Ranch Fire Safety

Dear Chair Barnhart and Members of the Planning Commission:

We represent the Lilac Hills Ranch project applicant and have been asked to respond to the incorrect and unsupported legal conclusions in the May 20, 2020 letter you received from the Shute Mihaly law firm regarding creation of an “ad hoc committee” last month to look into fire safety features for the project and the surrounding area.

First, the letter incorrectly states that the Commission violated the Brown Act by considering whether to form an ad hoc committee at its public meeting on May 15, 2020, and that such a discussion should have been placed on the agenda for a future Planning Commission meeting. This position misunderstands the concept of ad hoc committees – known under the law as “temporary advisory committees” – and confuses them with “standing committees.” (Cal Govt. Code section 54952(b).) Whereas standing committees, which are set up by formal action of a state or local governmental body to address on-going issues, have to be agendized, ad hoc committees are by definition informal, do not have to be agendized, and do not otherwise require compliance with the Brown Act.

As long as the ad hoc committee is: (1) comprised of less than a quorum of Commissioners; (2) set up to address a limited subject; (3) set up to last for a limited time; and (4) not granted the authority to make final decisions but instead makes recommendations to the full Planning Commission, it is not subject to the agenda or other requirements of the Brown Act and may be formed by informal action of the Chair at any time and in any manner. The proposed ad hoc committee for Lilac Hills Ranch fire safety features meets all of these criteria. If formed, it would not include a quorum of Commissioners; would only address fire safety issues and only for a short time period; and not be permitted to make final decisions, but would rather report back to the full Commission with information and recommendations.
Numerous court cases have confirmed the informal nature of ad hoc committees. In fact, the California Supreme Court has advised that the chair of a local appointed board may create a temporary advisory committee on his or her own, without the need to first place the matter on the agenda of a meeting, and without the input or concurrence of the other commissioners. (Freedom Newspapers v. Orange County Employees Retirement System Board of Directors (1993) 6 Cal.4th 821 [“operations committee” set up by chair of retirement system and comprised of less than a quorum of board members not subject to open meeting laws because merely advisory and all final decisions made by full board].) Therefore, the discussion in the Shute, Milahy letter of the limited statutory exceptions to the requirement that matters must appear on an agenda before any “action or discussion” may be taken is inapposite because, by definition, the creation of an ad hoc committee is not an official “action” of the Planning Commission.

Second, the letter incorrectly states that an ad hoc committee would run afoul of the County law which prohibits ex parte meetings between Planning Commissioners and project applicants (or opponents) after the project’s land use application has been filed. (County Code section 375.) In short, this prohibition is no longer relevant to the Lilac Hills Ranch project. As the letter acknowledges, the Planning Commission already held its hearings on the project approximately two years ago, so the due process concerns behind the ex parte contact rule no longer apply. The suggestion that Planning Commissioners should not be able to interact with members of the community or property owners to attempt to resolve issues relating to the County’s planning process also violates core values of government decision-making and the First Amendment. (Cf. City of Fairfield v. Superior Court (1975) 14 Cal.3d 768.) Because there is no longer any “fear” that the Commissioners may issue their decision on the project based on anything other than the testimony and documents presented at the hearing, this County Code does not apply to formation of an ad hoc committee.

In sum, there is no legal reason to halt the ad hoc committee from discussing fire safety measures at the Lilac Hills Ranch project and the surrounding area with members of the community or representatives of the project applicant.

As a final note, and despite the clear legal authorization for the ad hoc committee, Lilac Hills Ranch’s preference at this time is to proceed to the Planning Commission’s noticed, agendized public meeting set for June 12, 2020, given the contested nature of the formation of the ad hoc committee. Our understanding is that, at this meeting, the
Commissioners will hear a presentation from staff about fire safety measures and staff’s new recommendation to deny the project, and that they will give Lilac Hills Ranch the opportunity to respond to staff’s comments. Our understanding is also that members of the public, stakeholders, and all other interested persons will be able to provide input into staff’s comments. The Commission will evidently then make recommendations to the Board of Supervisors regarding the project’s fire safety measures, staff’s recommendations, and related topics.

Thank you for your consideration of our response to the Shute, Mihaly letter.

Sincerely,

[Signature]

James R. Sutton

JRS/dfm

#2009.01
New eComment for Planning Commission Hearing

Alyssa Wiesehan submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Definite no to the lilac hills ranch project

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New eComment for Planning Commission Hearing

Andrea Geise submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: As a resident of Valley Center, I’m writing to voice my strong opposition to the Lilac Hills Ranch project. It would not only increase traffic, fire danger, and strain limited resources, but is fundamentally detrimental to the rural way of life beloved by residents of our town. How many times have we said NO to this project? Yet it keeps coming back. I ask you to say NO once and for all, and bring a final end to this ill-conceived proposal.

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New eComment for Planning Commission Hearing

Anita Noone submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Lilac Hills Ranch is an abomination. How many times do we have to fight this battle? The backcountry is not made for this kind of development. Please don't put our lives at stake.

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New eComment for Planning Commission Hearing

Anthony Buxton submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This proposal is just what is meant by the remark here to avoid "Californicating Colorado." I have lived in Valley Center, and have many friends who still do, and weep at the despicable plans to turn a beautiful, rural community into an over crowded suburb. It will destroy all that is valuable in Valley Center. The traffic alone is untenable, to say nothing of the burden on schools, fire and police, and the tragic loss of agricultural space that make the area still attractive, and rare.

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New eComment for Planning Commission Hearing

Anthony Kurtz submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Wild fires are an increasing and terrorizing threat to our county. The vulnerability of this development to fire and the lack of escape routes has been a community concern since the very day this project was presented to Valley Center many years ago. I don't know how much clearer it can be that the people do not want this development. Please put the end to our misery about it." I certainly agree with her.

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New eComment for Planning Commission Hearing

Arleen Hammerschmidt submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Honorable San Diego Planning Commissioners - NO on LILAC HILLS RANCH! The well being and safety of County residents comes first. Do not create a liability situation for our county by approving a project that puts current and future residents in danger. Please follow the advise of County staff and the County Fire Authority; "THE (Lilac Hills Ranch) PROJECT IS UNSAFE AND IS RECOMMENDING DENIAL OF THE PROJECT." Thank you - Arleen Hammerschmidt

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New eComment for Planning Commission Hearing

Barbara Benjamin submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I am opposed to the Lilac Hills Ranch proposal. It is clear that the County staff and the County Fire Authority have deemed this project and the accompanying increase in the population of that area, a definite risk to the safety of the Valley Center community in the event of a fire emergency evacuation. NO to Lilac Hills Ranch!! Our safety is at risk! Sincerely, Barbara Benjamin

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New eComment for Planning Commission Hearing

Barbara GARCIA submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Both my husband and I oppose this project mainly for the safety issues.

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New eComment for Planning Commission Hearing

Ben Martin submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This development is a violation of the county's development plan. There needs to be tens of millions of dollars invested in existing infrastructure, not to be confused with investments in new infrastructure servicing just this development...all intersections to include the 15 freeway on/off ramps at Golpher canyon (all widened, traffic lights) and roads leading to the development (to include all roads on both the east, west, north and south of the development) must be widened with new lanes.

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New eComment for Planning Commission Hearing

Bill LeMasters submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please stop with the over development!

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New eComment for Planning Commission Hearing

Bob Bourdette submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This a really bad idea due to high traffic and limited ways out of this high fire danger area. I thought this was already put to bed.

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From: noreply@granicusideas.com
To: Jimenez, Ann; Barnhart, Douglas; Beck, Michael; Calvo, Yolanda; Edwards, Michael (LUEG); Flannery, Kathleen; Neufeld, Darin; Pallinger, David; Seiler, Michael; Slovick, Mark; Woods, Bryan
Subject: New eComment for Planning Commission Hearing
Date: Monday, June 8, 2020 3:15:55 PM

New eComment for Planning Commission Hearing

Bobby Glaser submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: It is time to stop wasting taxpayer money on pushing a development project that is NOT WANTED. It is not Safe. It is not acceptable to the Community, the Fire Department, the Planning Department, or the People of the County who voted down this project and it's twin "Newland Sierra" on the November ballot. We DO NOT WANT DEVELOPMENT IN OPEN SPACE AT RISK FOR FIRE STORMS. Please stop pushing bad development and start working on proper in-fill supported by existing services. Please vote NO.

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New eComment for Planning Commission Hearing

Brian Dreher submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Oppose

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New eComment for Planning Commission Hearing

Brrnt Curry submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: How many times do we have to block this development? Each time they come back but they’ve done nothing to make this development safe for the community itself and thought around it. I will vote out any county official who supports this development against the wishes of the citizens.

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New eComment for Planning Commission Hearing

Bruce Salerno submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This project was solidly defeated before and it’s only the back donor shenanigans of the developer that even puts it back on your agenda. We the people have said no more than once and we say no again. Please let Lilac Hills Ranch die the death it deserves.

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New eComment for Planning Commission Hearing

C G submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose this project. Please protect our community! This will harm our residents, raise insurance rates and risk lives

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New eComment for Planning Commission Hearing

carla hough submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Too many fires, too much traffic congestion, water shortage—we are still paying higher rates due to the drought a few years ago!!!
New eComment for Planning Commission Hearing

Carolyn Krammer submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please heed the warning from the County Staff and County Fire Authority that this project is unsafe. This project will once again put people's lives at risk and in grave danger. Please deny this project.

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New eComment for Planning Commission Hearing

Cassandra Johnston submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: No more houses

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New eComment for Planning Commission Hearing

Catherine Terrones submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: No to Lilac Ranch housing Development

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New eComment for Planning Commission Hearing

Cathy Miller submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: My husband and I vehemently oppose this project. It has been defeated 3 times and was even put to vote by residents of SD County. Follow the original plan and do not submit projects that need a revision of the general plan. The roads are 2 way country roads and egress in case of fire or other disaster is dangerous. New projects should be homes with 2 or more acres. More schools and fire services would be needed. Please listen to the fire professionals!

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New eComment for Planning Commission Hearing

Charles Mathews submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please do not let the power of special interest money, and the apparent obligations to it and to re-election of elected and appointed local government officials, override the sound planning and fire safety advice of your professional advisors and therefore vote to deny the planning application for the proposed Lilac Hills development.
New eComment for Planning Commission Hearing

Cheryl Bennett submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Apparently our vote as County residents does not matter. Lilac Hills Ranch was rejected by voters and that should be the end of it. However, greed and money apparently dictate County policy. This project should be rejected for a number of reasons not only including lack of adequate fire protection, evacuation routes, infrastructure, excess traffic spilling onto i-15 and surrounding neighborhoods. Additionally the area is zoned AG as per County Master Development Plan. C. Bennett Valley Center

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New eComment for Planning Commission Hearing

Chris Conway submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose lilac hills ranch. It will create a very hazardous area when fires are raging.

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New eComment for Planning Commission Hearing

Chris Ryan submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Roads are too tight and not made for that much traffic.

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New eComment for Planning Commission Hearing

Christine Hartunian submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Growth for the sake of growth is the ideology of the cancer cell. Don’t let Greed overcome your desires. Let’s keep San Diego from further overpopulation, let’s keep San Diego’s natural beauty. For the sake of our wildlife, and the sake of our safety (per fire department). We all know what the right decision is here

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New eComment for Planning Commission Hearing

Christine Joley submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: How many times do we have to vote this down?

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New eComment for Planning Commission Hearing

Cindy LaChance submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose Lilac ranch development also due to the fire safety issues. Have been thru 3 wildfires and roads are jammed with evacuees as it is. Not to mention the environmental impact a project this size will have.

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New eComment for Planning Commission Hearing

Claudia Hunsaker submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I appreciate that the County Staff and the County Fire Authority have come to the conclusion that a major fire would be devastating if this project were approved, there would be a tremendous loss of life. Please make sure that this project does not go through and create a fire hazard that can't be solved. It makes no sense to grant an exception to the County General Plan in this case.

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New eComment for Planning Commission Hearing

Dan Hazel submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: We currently get backed up on Circle R Drive leaving the area and having to make a left turn on Old 395 is almost impossible! I believe in a fire we would get stuck in a bottleneck trying to get on the interstate and it would be quite dangerous for all trying to evacuate on Circle R Drive.

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New eComment for Planning Commission Hearing

Dan Silver submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: We find no legitimate purpose here. Regarding fire hazard:: 1) There are no required easements. 2) An analysis discloses inadequate capacity of egress roads for evacuation demand, with risk of entrapment. The entrapment risk mandates project denial. Given these incontrovertible and un-fixable public safety factors, there is no reason to form the committee. We note that similar evacuation risks have elsewhere been ignored by this Commission, as well as by the Fire Authority and DPDS.

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New eComment for Planning Commission Hearing

Darryl Bentley submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Planning Commission: Please follow the recommendations by your staff and the County Fire Authority to deny the Lilac Hills Ranch Project. The vast majority of existing residents in North County concur and are already in serious danger when a wildfire occurs. The surrounding infrastructure will not accommodate this project, and to allow it to be built is a plan for future tragedy.

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New eComment for Planning Commission Hearing

David Bardwick submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: We who live in this area are already at risk for evacuation when a wild fire hit the area. To put us at greater risk as well as the people who would move into Lilac Ranch would be unconscionable. Both the County staff and County Fire Authority have recommended that this project be denied. I wholeheartedly agree. Please reject this proposal for all of our safety. Thank you, David and Amita Bardwick 7960 Faraway Lane, Elfin Forest

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New eComment for Planning Commission Hearing

Davita Stellway submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: We've been over this. The answer is always NO on this project. You have no infrastructure in place for putting that many homes there. And just because there hasn't been a fire here in a few years doesn't mean there never will be any. Very dangerous for all involved so you can make a buck.

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New eComment for Planning Commission Hearing

Dawn Haake submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: The Lilac Hills project continues to surface like a bad penny. The project over burdens the surrounding community, introduces significant risk to existing residents through its inadequate fire management plans, and it will do nothing to solve the affordable housing crisis in San Diego County. The county needs to put an end to it and focus on working with developers to introduce high density, lower cost housing units closer to public transit hubs (eg. apartments in San Diego proper).

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New eComment for Planning Commission Hearing

Dean Westmoreland submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This has been a bad idea for a very long time and overloading the area with cars and people in an emergency situation will only cause serious problems, this area does not need housing on every inch of what should be keep as farm land. Due to the situation that is going on at the moment with the covid 19 it is more evident that we need to get back to primary produce to help feed the people in San Diego county, please kill off the Lilac Hills Project.

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New eComment for Planning Commission Hearing

Deborah Chappie submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: It is ridiculous to keep building housing developments here n North County San Diego. Global warming is causing hotter and drier conditions up here and we are already asked to cut back on water usage. Is that because we want to keep building more houses? This problem needs to be faced as a realistic problem for the residents who live here. I really don't care if billionaire housing developers want to become trillionaires. Please use some common sense in this matter.

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New eComment for Planning Commission Hearing

Deborah Flynn submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: It’s astonishing that we continue to waste tax payer dollars on this flawed and failed proposal. Lilac Hills is a firetrap to not only new residents but to those of us who live here. Listen to the experts! Please stop the madness and vote NO!

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New eComment for Planning Commission Hearing

Debra O’Neill submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I agree with the County that this development is the wrong development for San Diego County. Putting current and future home owners at increased risk of entrapment due to a wildfire is not smart growth. I support the County looking out for the health and safety of the citizens of San Diego County.

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New eComment for Planning Commission Hearing

DENISE PATEY submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: The public voted against the Lilac Hills Ranch project in the last election. No, No, No, a thousand times NO!!

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New eComment for Planning Commission Hearing

Dianne Ghosh submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: First of all, Please vote no! The people have already spoken with a 2/3 vote against it on the ballot. The concerns of the county and the Fire Authority are valid and some of the same reasons that the people voted it down. We don't want this development in our neighborhood! Approving this project would be putting us all at risk in the event of a fire or other natural disaster. I have lived in Valley Center for the better part of 50 years and I am opposed to this project.

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New eComment for Planning Commission Hearing

Dirk Jones submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: All lives matter! Why would we put people’s lives in further danger in the event of a fire? None of it makes sense for our community. Put a stop to this madness NOW!!!

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New eComment for Planning Commission Hearing

dobie houson submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Highly oppose due to traffic and fire danger.

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New eComment for Planning Commission Hearing

Don Orahood submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I strongly oppose the development known as Lilac Hills Ranch. It does not meet the requirements of the County General Plan for Back Country development and could become an unmitigated disaster in the event of large fire events which are virtually guaranteed to occur. The County staff and County Fire Authority have clearly come out against this project and their conclusions against this project should end this project once and for all. Thank you, Don Orahood

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New eComment for Planning Commission Hearing

Donna Hein submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: County staff & County Fire Authority have listened to the Community about the wildfire & evacuation risks the Lilac Hills Ranch project poses to the Community. County staff & County Fire Authority have Determined this Project unsafe & is recommending DENIAL! Please listen to this recommendation! We need to be able to evacuate the current residents of Valley Center and take into consideration how all new development will effect a safe evacuation for everyone in this community. Thank you!

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New eComment for Planning Commission Hearing

Doreen Reagle submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: After reviewing documents and comments, I am requesting that San Diego County deny approval of Lilac Hills. Being born and raised in San Diego County, wild fires are inevitable. Having proper ingress and egress for emergencies and evacuation are crucial for new developments. Send the developer a clear message! Please listen and heed the experts, your staff and fire department and do NOT approve Lilac Hills.

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New eComment for Planning Commission Hearing

Doug Fiske submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Two-thirds of voters defeated the proposed Lilac Hills project in a countywide vote. What palm-greasing and back-room deals have it rearing its dangerous and ugly head again? The voters have spoken. Heed our voices!

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New eComment for Planning Commission Hearing

Eleanor Roper submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: We already voted this down. I am outraged it is back up for discussion. I will vote any county supervisors out that vote for it.

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New eComment for Planning Commission Hearing

Elisabeth Gruwell submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please vote no for our safety.

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New eComment for Planning Commission Hearing

Elizabeth Burris submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Oppose!

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New eComment for Planning Commission Hearing

Eric Laventure submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: After being on the VC Planning Group for many years, I vehemently oppose this project! The risk to life and limb, between the 2 lane winding country road and the risk of wildfire in this area is to great of a risk! No on Lilac Hills Ranch!

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New eComment for Planning Commission Hearing

Ericka Schwarm submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: The Community has spoken.

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Francois Cyr submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This plan and its impact on the environment, the lack of infrastructure and the will of the county at large has already been explored and decided upon. No means No. The County voted in Proposition B to not approve this plan as it is in direct violation of the Master Plan and has significant environmental impact and lacks all necessary infrastructure plans to support it. The residents of the area (of which I am one of them) is vehemently opposed!!!!!

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New eComment for Planning Commission Hearing

fred wollman submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Lilac Hills is a bad idea. Building new small cities in the country / rural areas, separated from infrastructure, fire / safety is poor planning that puts 1,000s more commuters on our already crowded freeways is short-sighted. Think in terms of housing that shortens commute times and lowers environmental impact. What is sustainable for the next 100 or 200 years. We cannot continue to do things as we have. Fred Wollman

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New eComment for Planning Commission Hearing

Gary Nelson submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Dear Planning Commission: I agree with the County staff and the County Fire Authority have "DETERMINED THAT THE (Lilac Hills Ranch) PROJECT IS UNSAFE. I live in the Circle R Ranch Development that would be adversely be impacted by a wild fire. The roads in this area are very inadequate to handle emergency evacuation that would occur due to a wild fire. Please help us and our families to stop this development once and for ALL. Thank you, Gary Nelson and Family

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New eComment for Planning Commission Hearing

Gary Williams submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose new construction in areas like Southern California which are already stressed with water shortages, traffic congestion, and air pollution. It is not necessary for San Diego County enlarge it's population.

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New eComment for Planning Commission Hearing

Gayle TaylorSelby submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: No on Lilac Ranch!!!

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New eComment for Planning Commission Hearing

Gerald Scallion submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: In my opinion these roads are not up to capacity or safe for the kind of traffic that this development would bring. Its already scary out here during fire season and the thought of evacuating our livestock and pets safely would be enough to cause emotional damage to anyone concerned about safety! These are some of the curviest roads in the county and there is no way to widen them or straighten them out that is feasible! Please say no to this overly aggressive building plan!

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New eComment for Planning Commission Hearing

greg kalajian submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Twin Oaks Valley Road is already overloaded at rush hours and can not handle more traffic.

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New eComment for Planning Commission Hearing

Gregg Whitesell submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Why do we continue to take up time in regards to a project which does not follow the general plan, builder has refused to follow the general plan, has been voted down by all of San Diego County (No on B) twice. Well I am hoping someone will finally see human lives matter, and do the right thing. A recent study found portions of California that burns from wildfires every year has increased more than five-folds since 1972, and will continue to increase. Does not make sense, so it must be greed.

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New eComment for Planning Commission Hearing

Hans Britsch submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: LOCATION! For 12 years the main problem with this development has been wrong location. Putting a city, the size of Del Mar, in the middle of rural ag land will only lead to disaster. Fire danger is one of my foremost concerns. I support the County’s staff and Fire Authority’s joint recommendation to end this project. The fact that you are trying to form an adhoc committee in an attempt to reverse and water down the decision made by County staff and Fire Authority is wrong and lacks integrity.

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New eComment for Planning Commission Hearing

Hans Haas submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Lilac Hills Ranch was defeated as prop B in 2016 by a huge margin & there have been no significant changes to the scope of the project in this version. LHR is still a high density project in rural countryside. It's in a high fire danger zone & the surrounding area lacks the road infrastructure to safely evacuate the residents of LHR. The majority of the homes proposed will be unaffordable for the typical young family, especially given the tough economic times we are in.

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New eComment for Planning Commission Hearing

Harris Korn submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Even with the newest revisions this project is not suitable for our area of North County. The infrastructure is not in place to support such a massive change to the general plan. Please listen to surrounding communities, and now your own staff. Please stop wasting time, effort and taxpayer's dollars on developments that are not smart growth. Follow the General Plan and please put a final end to this project.

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New eComment for Planning Commission Hearing

Helen Polito submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: The people who already live in the area will have a hard time evacuating when there is a fire & now you are going to have to deal with more people? It’s a death trap!
New eComment for Planning Commission Hearing

Jaclyn Davenport submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please consider denying this project due to multiple safety concerns.

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New eComment for Planning Commission Hearing

Jacqueline Arsivaud submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I urge you to DENY the wasting of taxpayers dollars that would result in the formation of an Ad Hoc subcommittee for the Lilac Hills Ranch project. Both staff and Fire authorities have determined that the project cannot be built safely. In our own lawsuit against the County on Valiano and HGVS, the Judge was very clear that fire evacuation issues could not be simply swept under the rug with some vague assurances. The risk of entrapment cannot be studied away. Don't carry water for LHR, say no.

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New eComment for Planning Commission Hearing

James Brown submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I strongly oppose this project, and it's absurd that it's still being considered with all the potential and devastating risks involved.

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New eComment for Planning Commission Hearing

Jane Mushinsky submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: The county has a practical and a moral obligation to make affordable housing available for current and would-be residents. There is no similar obligation to help developers profit. The county needs energy efficient, affordable housing located near transportation corridors. It does not need another collection of McMansions in high fire risk wild lands. I ask the leadership to put the needs of people in this county before the desires of developers who are motivated entirely by their own profit.

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New eComment for Planning Commission Hearing

Jannine Oberg submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: If Public Safety, as stated by the majority of County Supervisors, is #1, then now is the time to prove it to the citizens of North County. We don't need a Paradise Fire with an even higher death rate here in our County. Developers should never be allowed to get this far in the process. Wilderness high fire risk areas are always inappropriate for housing developments. Change your standards to protect the wilderness and the residents of San Diego County. It's time to make a Final No Vote!

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New eComment for Planning Commission Hearing

Jason Geise submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I fail to understand why this project is still utilizing taxpayer resources; it has, by the vote of the people multiple times, been voted down. Until such time as San Diego County can sustainably, economically, and ecologically mitigate fire risk there is no reason to plan large developments in rural areas.
New eComment for Planning Commission Hearing

Jennifer Brown submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I think we are at a time in this country where we’re tired of our representatives not listening to the voice of the people. This project is overwhelming opposed by the community for many reasons, fire exit routes being number one. I live on a road that dead ends and the only way out is West Lilac. Please realize putting people’s lives and potentially your jobs at risk is not worth it. Vote no.

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New eComment for Planning Commission Hearing

Jessica Morgan submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I don't see any possible way for the amount of increased traffic this project would bring to the area to be safely mitigated. The roads are already dangerous given the landscape alone, adding that amount of traffic is irresponsible. Getting out of our driveway onto the main road is already difficult during certain times of the day. We adamantly oppose this project.

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New eComment for Planning Commission Hearing

Jessica Wierson submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I voted against measure B for the safety of my family and our community. Please see through the money and politics and put the community safety first. As a 32 year 2nd generation VC resident, living through evacuations and fires has shown me what can happen. Congested roads and communities with lack of planning are not acceptable. Remember the lives we have lost. No on Lilac Ranch.

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New eComment for Planning Commission Hearing

Jill Tisdale submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This is a horrible plan. The last fire was a disaster. No one could get in or out. Our horses were almost set on fire. When I did leave, they sent us to Fallbrook high, then evacuated us with nowhere to go. Meanwhile my horses were surrounded by fire and my husband was sitting on the closed 76 as the fire was coming toward him. It takes 1/2 hr to get to Oceanside ON A GOOD DAY. no way can there be hundreds of AGENDA21 sustainable housing built Here. We won't have it. STOP IT RIGHT NOW!

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New eComment for Planning Commission Hearing

Joan Slavinski submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: there is no way that this is a safe development. There is no way that fire could be stopped on that steep land--please turn down and suggest they consider large acre development!!!

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New eComment for Planning Commission Hearing

John Fox submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This is the wrong development in the wrong location...People's lives will be at HIGH risk when a fire comes and they will come as has been proven in the past. People should matter more than tax dollars to the county. The environment, wild life, eminent domain, lack of water, increases in property taxes to existing property owners, increased traffic, noise, impact on Old Hwy 395 are but a few of the many other issues, not to mention the developers list of lies, should be enough to warrant your NO vote.

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New eComment for Planning Commission Hearing

JOSIE BLUE submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: It is ridiculous that the board overturned what our ENTIRE county voted against. WE THE PEOPLE recognize that this is just another greedy move by developers and officials that DO NOT care for the needs of their constituents. We need more LOW-INCOME housing in URBAN areas, not mini-luxury homes in UNSAFE rural areas, adding to more congestion on the roadways, higher fire risk, more accidents on backcountry roads, and mass destruction of agriculturally protected areas with endangered species.

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New eComment for Planning Commission Hearing

JP Theberge submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Formation of an ad hoc committee to discuss unprecedented denial recommendation from County staff and CFA is another attempt to push through a bad project that will harm the public. Commissioners Barnhart and Woods have shown they lack objectivity and should recuse themselves, particularly given Woods statement "it is possible to find a solution" to the problems raised by PDS. Recent lawsuit (HGV South) showed that the courts will not stand for dangerous projects with unscientific findings.

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New eComment for Planning Commission Hearing

Judith Segina submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose the building of the Lilac Hills Ranch Project.

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New eComment for Planning Commission Hearing

Judy Vance submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Will it take deaths and injuries during a fire evacuation for you to understand the seriousness of this issue? Are you being paid by the developers? Take the Lilac Hills Ranch project off the table permanently. The County has identified 19 locations on West Lilac and Circle R Dr which present "a significant civilian entrapment potential." The County has also said that flame lengths of 40 to 60 feet could be expected and will entrap motorists. Stop this NOW. Judy Vance

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New eComment for Planning Commission Hearing

Karen Binns submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose the formation of an Ad Hoc Committee regarding the Lilac Hills Project. This project is a boondoggle. It is also a "zombie project" that keeps coming back. It is very unusual for County staff as well as the County Fire Authority to oppose a project. This is an unsafe project. I remember when the EIR came out a few years ago the Developer had 10 road segments that he wanted exemptions on. No exemptions should be ever granted where the safety of the community members are at stake.

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New eComment for Planning Commission Hearing

Katherine Stewart submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Dear County Supervisors, and in particular Supervisor Fletcher, who is my representative: Lilac Hills is a terrible proposal and should be denied as recommended by staff and fire experts. Please do the right thing for all the right reasons. Katherine "Kay" Stewart

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New eComment for Planning Commission Hearing

Kathryn Carbone submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This project has strong community opposition, and there is an "election attorney" harassing the private citizens groups and pac treasurer of this and other bad sprawl projects such as Newland Sierra and North River Farms. These frivolous lawsuits and fake FPPC complaints are generated on behalf of the developers why? Because their housing projects in high risk fire zones are so great? Please don't be fooled, just vote no Google <Redondo Beach sutton firm> and <dirty tricks north river farms>

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New eComment for Planning Commission Hearing

Kelly Macdonald submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please stop the Lilac Hills Development from being developed. I feel like year after year we keep fighting this development. When will it be enough?

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New eComment for Planning Commission Hearing

Kim Freeland submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This will increase the traffic on the 15 fwy, which is already a nightmare. And if there is a fire, how will we all get out. We’ve voted on this development how many times now? We the People have spoken. Why is this still coming up??

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New eComment for Planning Commission Hearing

KIMBERLY LAVENTURE submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Unless this Development is Required to Widen the Roads to and from it, provide it's own Fire Station so that response times are 5 minutes or less and build some sort of School to add to a Current School District, my VOTE again since we've already Voted No on B previously is NO! NO! and NO! Thanks!

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New eComment for Planning Commission Hearing

Kristal Raiger submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I STRONGLY oppose Lilac Hills development. I live off of Circle R Drive and have been through several fire evacuations. This would put my family and neighbors at risk of DEATH as there is only ONE way out! The additional traffic can’t be handled even without a fire... even the entire San Diego county already said their NO!!! We don’t want development up here, it’s NOT SAFE! I drive my son to Rady Childrens for cancer treatments, more traffic means longer drives and higher risk for his life! No!

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New eComment for Planning Commission Hearing

L Adams submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I frequently travel westbound and the Deer Springs area can rapidly back up with traffic, especially when college is in session. This is no place for a large development. We need AFFORDABLE housing, and close to mass transit. Large developments that are not near school & work just create more air pollution and destroy habitat.

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New eComment for Planning Commission Hearing

Lael Montgomery submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This project was an ill-conceived disaster when former Supervisor Bill Horn tried to sneak it into the GPUpdate in 2006; when the County Planning Department recommended PAA denial in 2010, and when voters rejected it in 2016. Millions of dollars and hours of public and civic time have been squandered on review after review. Rough, creek-crossed, inaccessible terrain is no place for a city. Deny this zombie project once and for all. Build homes in Villages where housing has been planned.

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New eComment for Planning Commission Hearing

larry markey submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: My family supports the General Plan and smart growth of which this hot mess is neither. The voters, in their common sense, rejected this disaster already. Citizens of North County don't want to be victimized because greed and avarice has distorted good judgment. Please reject this project

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New eComment for Planning Commission Hearing

Larry Schultz submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I live very close to the proposed LHR project and I firmly oppose it. —Voted down before under a different name—the developers are trying to sell us another flawed plan. The roads in this area were never meant to carry the kind of traffic a project like this will cause. If there’s a fire/evacuation order you put our lives in jeopardy if this is built. Stop letting this insane project come back to life after it’s been voted down by a majority! STOP IT NOW!

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New eComment for Planning Commission Hearing

Lauraine Esparza submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Strongly support the staff recommendation.....the inability of the project to allow swift & safe evacuation in the case of fire is frightening. Since all alternative, contingency and emergency routes have been found by your staff to be inadequate (and under certain circumstances even dangerous"), you would be courting disaster if you decided to allow the project to move forward. Please do the sensible and prudent thing: Vote No.

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New eComment for Planning Commission Hearing

Laurel Beale submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose the Lilac Hills project for many reasons. First being that it would be very difficult to get out of the roads up here in a fire. Secondly we don’t have the water resources to have more and more houses in this area. We are told to reduce our water usage now. Where would the water come from to service many more houses? Thirdly this is a rural area and adding that many houses would take away our rural setting where livestock are welcome and you are not jammed up against another house.

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New eComment for Planning Commission Hearing

Laurel Brittain submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please don’t allow this development in our small community. The roads are so tight and winding up here it would be catastrophic to try and get out during fires with that many more homes here. All our neighbors are on acreage, it’s a beautiful valley and loved by its community. Please do not allow this developer to break county guidance just to make money. We love our community please help us save it!

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New eComment for Planning Commission Hearing

Lee Schwarz submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Even the people of Chula Vista, (where it doesn't affect them), were wise enough to cut through the fancy ads showcasing happiness and prosperity for everyone and oppose this rotten project! It violates our general plan for NUMEROUS reasons. The entire county voted against it 2:1! Most every major organization is against it. Why do you continue to waste our taxpayer dollars? Does one of you have something to gain? Follow Diane Jacob who makes her decisions with integrity and be done with this!

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New eComment for Planning Commission Hearing

Linda Nelson submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I live within a mile of the proposed project and off Circle R and Mountain Ridge that provides access to the proposed project. I firmly oppose this project in San Diego County. It is the wrong project to afford protection to the people that already own property in this close vicinity and the lack of infrastructure puts our lives and our neighbors lives in danger in the event of a evacuation alert.

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New eComment for Planning Commission Hearing

Lois Sklar submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: County Staff and County Fire Authority have submitted many important concerns about this project. There has already been a vote by the residents of this county that clearly shows people do not support this project. I do not understand why it is once again being considered!

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New eComment for Planning Commission Hearing

Madeleine McMurray submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose moving forward with the Lilac Hills Ranch Project because of the extreme rate of wildfire spread. During critical fire weather, rapid rates of fire spread from the Valley Center/Pala/Pauma Valley area towards the Lilac Hills Ranch project could range from 18,000 to over 30,000 feet per hour with peak flame lengths of up to 60 feet. At that rate of burn, a wildfire could burn through West Lilac Road and the project in under an hour; an "extreme rate of wildfire spread."

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New eComment for Planning Commission Hearing

Madison Wilson submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Southern California is past the point of accommodating rural land development. Rural spaces need to be preserved as habitat corridors in order to protect the last 10-15% of native habitat in the most biodiverse county in the USA. All housing in rural high fire risk areas needs to be halted. Otherwise fires will continue to ravage highly flammable and poorly placed residential areas. Do not allow Lilac Hills to move forward with development. Think of the future, not nearsighted dollar signs.

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New eComment for Planning Commission Hearing

Marcos Britsch submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: County Staff, Fireboard, community members, and voters of San Diego all agree - this development is dangerous. The only dissent - the developers...and now we are considering to "reevaluate" the professional conclusions of county staff and fireboard because the developers think it's safe? Its no secret this commission probably wants this project approved, but that doesn't mean you should censor the voices of professionals who disagree. Transparency and honesty are important for good government.

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New eComment for Planning Commission Hearing

Margaret Morand submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please listen to what the voters in the area have already strongly voiced and to what the fire department has to say about not proceeding with this project. It will negatively impact our community in so many ways. Please don’t add to the traffic and other problems we are already experiencing in our area.

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New eComment for Planning Commission Hearing

Margaret Wiesehan submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I can't believe this keeps showing up. This needs to be put to bed and dismissed. Please don’t let this go thru, it will ruin our beautiful community.

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New eComment for Planning Commission Hearing

Marian Sedio submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: As a resident of Valley Center for 35 years my family and have had to deal with wildfires a number of times and it is terrifying. Please do not approve this development that would be located in a rural area that is prone to wildfires. Please keep in mind that that it is forecast that Southern California will be entering into another drought which will only exacerbate the wildfire risk. Adding a large development will make it harder for people already living in the area to evacuate safely.

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New eComment for Planning Commission Hearing

Marianne Holtz submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Strongly opposed.

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New eComment for Planning Commission Hearing

Marion Holtz submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Lilac Hills Ranch Project is unsafe due to wildfire danger and inadequate ability to evacuate the area. Please vote NO.

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New eComment for Planning Commission Hearing

Mark Seebach submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Lilac Hills Ranch has been rejected by the people 3 times, it is time to end this (and the rejected Newland Sierra) once and for all. These are behemoth projects (1,000's of people & cars) trying to be built in severe fire hazard areas, with limited ingress/egress capacity to evacuate in an emergency. No adequate traffic mitigation plans are proposed. Just because a developer buys cheap land doesn't mean it's a good place to build. Reject the amendment and ADHERE TO OUR GENERAL PLAN. Thank You.

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New eComment for Planning Commission Hearing

Megan Flaherty submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose moving forward with the Lilac Hills Ranch Project, as it will create dangerous wildfire conditions for both current and future residents. Listen to the people, and to County and fire staff, and shelf this inappropriate project.

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New eComment for Planning Commission Hearing

megan Gamble submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: We strongly oppose this development and worked hard to see it soundly defeated 3 years ago with Prop B. It is preposterous that this item is back on your agenda. Listen to your citizens; listen to County Fire Authority; listen to County Staff. And do the right thing NOW

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New eComment for Planning Commission Hearing

Melissa Ritzer submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: There is already so much congestion and traffic in north county. More homes (jammed together, tiny, and unaffordable for most) just doesn’t make sense.

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Melissa Schulz submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I strongly oppose the Lilac Hills development for the safety reasons identified by the county staff and county fire authority. Please reject this development for the safety of everyone who relies on West Lilac as an evacuation route!

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New eComment for Planning Commission Hearing

Michael Goss submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Strongly agree with Fire Dept. decision. Having been here during 2003 and 2007 fires, roads were a mess. As in more recent fires on interstate 15, freeways were stopped while fires burned next to drivers and their cars/trucks, etc. Access roads were all blocked. No emergency vehicles could access. People were trapped. Animals could not be evacuated. Until either the developer and/or county decide to build New or expand existing roads out of Valley Center, NO MORE DEVELOPMENT should be allowed.

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Michael Wilkinson submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Lilac Hills Ranch Project is patently unsafe. It doesn't take a Rocket Surgeon to figure out that evacuation during a wildfire would lead to the same end as evacuating Paradise, CA during their wildfire. Please vote NO on this treaty waiting to happen! R. Michael Wilkinson Valley Center, CA

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New eComment for Planning Commission Hearing

Minette Ozaki submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: We said no to Measure B. I still say no to this development. How much time and money must be wasted to keep arguing the same issue? Please listen to the fire authority's recommendation. Please listen to the voices of the residents who will be impacted by the public safety hazard this development will cause. no, No, NO!

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New eComment for Planning Commission Hearing

Natalie Curcio submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: How many times do we have to say “no”?

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New eComment for Planning Commission Hearing

Nikki Leeds submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: To The Attention of the Esteemed Planning Commission, The LHR Project would undoubtedly create a grand scale public health and safety hazard and would result in an apocalyptic wild fire event leaving the community trapped. Such a development would also obliterate the natural habitat and decimate vital ecosystems. PLEASE DO NOT ALLOW such a dangerous development to be approved. Human lives are at stake. Yours in health, Nikki Leeds

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New eComment for Planning Commission Hearing

Oliver Smith submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Governmental and fire professionals are independent watchdogs of community safety. I ask that the County Planning Commission members seriously consider the joint recommendations proposed by the professionals in County staff and the County Fire Authority in light of responses by any individual or group having a primary vested financial interest in the project moving forward.

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New eComment for Planning Commission Hearing

Patrick Canler submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Oppose over development of Lilac Hills Project. No means no!

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New eComment for Planning Commission Hearing

Pauline Voges submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This high-risk fire-prone area is not the place to build dense, affordable housing. Development of this type should be built near infrastructure and transit lines to mitigate congestion and traffic and not in this rural area where water is scarce, and roads are not accessible for residents to exit in an emergency such as a fire. This is dangerous! I oppose this building structure. Please do not approve. Thank you.

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New eComment for Planning Commission Hearing

Pennie Leachman submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please listen to County staff and the County Fire Authority recommendation for DENIAL of Lilac Hills Ranch due to evacuation and wildfire concerns. And listen to the voters -- three years ago, the developer spent $5 million on deceptive advertising in support of Measure B, but the voters were not duped -- despite outspending opponents more than 10 to one, Measure B went down in flames with two-thirds of San Diego County voters saying NO!

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New eComment for Planning Commission Hearing

Penny Fedorchak submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I opposed the Lilac Hills project by voting no. My NO vote still stands.

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New eComment for Planning Commission Hearing

Peter Randolph submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: The risk to life in the event of wild fire (inevitable, given the area involved and history) and the inadequate mitigation in the developer's plan requires that this proposed development be denied. Please accept and respect the responsible analysis provided by Fire Authorities and County Staff and deny this development. Don't be responsible for future and inevitable death from unnecessary development in high risk fire areas of our County.

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New eComment for Planning Commission Hearing

Ray DeLautre submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I STRONGLY OPPOSE THIS PROJECT. OUR ROADS ARE NOT ADEQUATE FOR MORE TRAFFIC AND FIRES AND WATER ARE ALWAYS AN ISSUE. WHERE I LIVE AND NEIGHBORS AROUND ME HAVE AT LEAST 2 1/2 ACRES OR MORE. I DON'T WANT CONDENSED HOUSING AND STORES AND WHATEVER ELSE YOU THINK IS VITAL TO OUR AREA. WE LIKE OUR COUNTRY LIVING. THANK YOU, RAY DE LAUTRE THANK YOU FOR YOUR TIME, SINCERELY, RAY DE LAUTRE

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New eComment for Planning Commission Hearing

Rebecca Littlejohn submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please do not go through with this project proposal especially with the limited amount of fire protection that we currently have. The fire risk is way too high & the potential for problems that will arise in the event of a fire are not worth it to the many residents & fire fighters who will be in dangerous or life threatening situations. We already need more fire protection right now without the added risk that building even more homes will bring to this area. Better plan needed elsewhere.

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New eComment for Planning Commission Hearing

Rebecca Randolph submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: We would all feel terrible if a wildfire in this area resulted in loss of life, and that is what I fear will happen if Lilac Hills is developed as planned. I understand that the speed and size of the possible flames in this area, coupled with the inadequacy of the roads for emergency evacuation, could be catastrophic. I am sorry that the developers' years of hard work and apparent efforts to be socially and environmentally responsible will be for naught, but the risk is much too great.

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New eComment for Planning Commission Hearing

Robert Foster submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: How many times y'all gonna try this?

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New eComment for Planning Commission Hearing

Robert Lerner submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: In the interest of full disclosure, I identify myself as the historian of the Valley Center Historical Society, but only to offer perspective in my knowledge of the 175-year history and development of this community, and the manner in which this specific development, in its present form, would significantly alter the character of the area, and increase an already unacceptable level of fire risk.

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New eComment for Planning Commission Hearing

Robert Miller submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I am opposed to the Lilac Hills Ranch (LHR) Project. The development will do nothing to provide for affordable housing and it is another example of leapfrogging into the countryside when new development needs to be focused where infrastructure is already in place.

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New eComment for Planning Commission Hearing

robert nosek submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: The people of San Diego County voted this down. Even considering this project in direct conflict with a settled voted measure is illegal

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New eComment for Planning Commission Hearing

Robin Morris submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I voted against Measure B in 2016 and I still strongly oppose this project.

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New eComment for Planning Commission Hearing

Roxanne Greene submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Lilac Hills Ranch, in any iteration is an extremely ill conceived project set in a dangerously fire prone area. A county wide vote agreed with this position and I do not understand why it's even back on your docket. Residents of this project will not be able to evacuate safely in the event of a fire and shelter in place has been shown to be an ineffective safety tool as half of all deaths in the Black Sunday Australia wildfires were those sheltering in place.

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New eComment for Planning Commission Hearing

Ruth Mattes submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: How many times must we point out that this plan is detrimental to San Diego and its surrounding communities? The fact that they keep coming back with a "new" costume does NOT make it any more attractive. The developers bought cheap rocks and want to make a "killing" no matter how many lives they endanger due to fire, traffic, pollution, environmental threats, etc. You get the picture! They never reduce the number of homes to maximize their profit. GREED at its worst. Enough!!

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New eComment for Planning Commission Hearing

Sandra Duchac submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please deny the lilac hills project. We do not have the needed infrastructure in place for this number of homes. Further, the proposed properties do not meet the minimum acreage requirements.

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New eComment for Planning Commission Hearing

Sandy Heath submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: We've lived in this area for 27yrs and vehemently OPPOSE the development of the Lilac Hills project. Thank you Sandy Heath

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New eComment for Planning Commission Hearing

Sandy Zelasko submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I OPPOSE the Lilac Hills Ranch (LHR) Project. This proposed development is wrong for Valley Center and the geographical area for several proven reasons. Wildfire evacuations would EXCEED road capacity making it a death trap potentially "entrapping motorists." Valley Center is NO place for the Lilac Hills Ranch Project! Please oppose this horrific idea and SAVE LIVES! Thank you for your consideration.

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New eComment for Planning Commission Hearing

Sarah Costi submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I am a resident opposed to the Lilac Hills development. We voted against it; that means their claim of a housing shortage isn't supposed by those of us who need housing here. New homes are not affordable for low income households anyway; their motive is profit and they will destroy our county to get it.

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New eComment for Planning Commission Hearing

Shaina Miller submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: If the county approves this it will be going against the will of the voters, over 750,000 voters said no to Measure B and this development. This will be a fire DEATH TRAP for us. Instead of continuing to approve developments that sprawl across our open space and need amendments to our general plan, start tackling this problem in responsible ways. BOS be innovative with development that is good for the housing needs of San Diegan's while keeping people safe, and our rural county preserved.

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New eComment for Planning Commission Hearing

Shirley Norell submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Not safe to build Lilac Hills Ranch.

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New eComment for Planning Commission Hearing

stan ruland submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: As property owners in the MESA VERDE NEIGHBORHOOD, due-east of this "Lilac Project," we oppose this project as UNSAFE and DANGEROUS. We agree 100% with the County Staff and County Fire Authority position. West Lilac Road is one of the worst roads in the county. We don't need to create a potential Paradise Fire situation in our neighborhoods!---Stan and Virginia Ruland

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New eComment for Planning Commission Hearing

Stephanie hiller submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Completely Oppose Lilac Hills.

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New eComment for Planning Commission Hearing

Susan Casad submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: NO to the Lilac Ranch project!

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New eComment for Planning Commission Hearing

susan stiver submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: The Lilac Hills Project does not make sense. I am wholeheartedly against it. Fire danger, lack of sufficient safe exit roads in the event of fire, impact on the environment, traffic congestion are just a few reasons this project should not go forward.

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New eComment for Planning Commission Hearing

Susan Williams submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: PLEASE...no more approval for projects like this are unsafe and endanger our good folks of San Diego County!!!

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New eComment for Planning Commission Hearing

Theresa Acerro submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Why are you not listening to the fire people and staff who know how inappropriate and dangerous this project is? It needs to be rejected.

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New eComment for Planning Commission Hearing

Theodore Sumner submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I have a feeling that no matter the opposition it will fall on deaf ears. Prop B went down in flames, listen to the voters. For once…. Oppose!
New eComment for Planning Commission Hearing

Timothy Swift submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Continuing to construct ill-advised sprawl development communities into San Diego’s natural chaparral habitat SIGNIFICANTLY increases both the likelihood and intensity of these fires. Planning efforts need to focus on infill development rather than continuing to expand into wild-lands. This protects us, property, wildlife, economics, and our climate. We need to STOP building in fire prone areas. Period.

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Tom Painter submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: The Lilac Hills Ranch Project needs to be formally and finally rejected for a host of reasons. Fire danger, crowding, sprawl, lack of resources (roads, freeways, water, etcetera). Simply put, developers will ruin San Diego if allowed to. Please stop this from happening.

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New eComment for Planning Commission Hearing

Tylia Tietje submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Our votes already communicated community opposition. Respect the voice of the people. Without further development of roadways & landscape to allow safe & timely evacuation of current and proposed future residents, this plan is a hazard to human safety. Developers have not responded to address fire safety concerns, why would they in the future? Our area is high fire risk and Fallbrook has already experienced fire evacuation issues. More people means more traffic. Don't trap us and make us burn.

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New eComment for Planning Commission Hearing

Vi Mooberry submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I am definitely opposed to the Lilac Hills project. How it could even be considered in this time in which we live is completely unrealistic. We fight too many battles as citizens trying to survive to, in addition, add one more fire trap.

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New eComment for Planning Commission Hearing

Victoria Davis submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I was here during lilac fire, Oppose
New eComment for Planning Commission Hearing

Victoria Tenbrink submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I feel it is my duty as a citizen to oppose the Lilac Hills proposed housing development. I cannot support having people move into a fire prone area without adequate protection from catastrophic wildfire. I cannot support the risk to firefighting personnel trying to protect lives and infrastructure proposed for the area. I cannot support the externalized costs of any disaster that we all will have to pay for. Thank you. Victoria Tenbrink. Escondido.

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New eComment for Planning Commission Hearing

Wade Rollins submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: We live in the neighborhood up off of mountain view we have lived here for over 10 years and built our own house here. We chose this area because of the farm feel and the four acre minimums, with no housing developments in the area.
New eComment for Planning Commission Hearing

William Ewing submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: LHR is on a plateau with only three roads that provide access. W Lilac is main access road but not being widened due to Lilac Bridge, no additional outflow capacity in event of a fire. W Lilac beyond project & Circle R have significant narrow sections and tight curves. Lilac beyond Circle R too narrow and tight for anything larger than an auto. Emerg equipment, ambulances & people need to use roads at same time. FD will close roads for fire, NOT ENOUGH OUTFLOW CAPACITY WITH ALL ROADS OPEN!

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New eComment for Planning Commission Hearing

Zoe MarinelloKohn submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: It has been brought to my attention that the County Staff and Fire Authority have determined that the Lilac Hills Ranch Project is unsafe and is recommending denial of the project. I grew up in Santa Rosa CA and I watched as much of the city was consumed in flames in the Tubbs Fire in 2017. I am especially concerned about this project and the potential loss of life that could occur if it is allowed to proceed. Fire danger is also expected to increase as a result of the climate crisis

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New eComment for Planning Commission Hearing

Allan Brassard submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I too remain opposed, how does this rejected plan keep materializing?

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New eComment for Planning Commission Hearing

Ann Brassard submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I am opposed to the Lilac Hills Ranch project. This beautiful rural area up in the hills should remain the way it is. Give nature a chance to survive

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New eComment for Planning Commission Hearing

James Elliott submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I remain opposed to leapfrog development as proposed by this development.

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New eComment for Planning Commission Hearing

Lindsay Natale submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: It's wrong on many levels to keep paving over land that can feed our people with food just to feed pocket books of the greedy. Leave something sacred alone and see the long term damage of putting in more dense population. Wrong. All wrong. There's no infrastructure!

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New eComment for Planning Commission Hearing

Christine Hrountas submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Saratoga Estates

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New eComment for Planning Commission Hearing

Erika Wanczuk submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose Lilac Hills Ranch. LISTEN TO THE PEOPLE: A version of the LHR project was voted down by almost 64%. It violates the General Plan. The location is DANGEROUS; there is insufficient means of egress for residents to evacuate during a wildfire. There are insufficient plans for road improvement, schools, fire, and so on. It will exacerbate the water crisis. There are not enough affordable houses planned for LHR. It will not help the affordable housing crisis. The developer is untrustworthy.

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New eComment for Planning Commission Hearing

Joey Westmoreland submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: No, no, no. This is a dangerous and terrible development proposal. Not enough water, fire department resources, roadways, or infrastructure.

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New eComment for Planning Commission Hearing

Kathy Parrish submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: County staff and the county fire authority have determined the project is unsafe due to fire risk. No need for an ad hoc committee to try to undermine that.

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New eComment for Planning Commission Hearing

Matthew Vasilakis submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Dear Commissioners, on behalf of Climate Action Campaign, we urge you to oppose any further action that advances the Lilac Hills sprawl development. In addition to the the County already struggling to meet state climate law partially due to the approval of similar auto-dependent housing projects, Lilac Hills is in a dangerous wildfire prone area. Advancing this development risks the lives of its potential residents, firefighters and first responders. Please oppose. Thank you.

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New eComment for Planning Commission Hearing

Philip Stone submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please accept the advise of fire officials and others that caution against the fire hazards relative to Lilac Hills Ranch. We that live in the Valley Center Area are justified in our caution about wild fires, because we have experienced wild fires first hand and understand the tragedy of lost Human lives and valuable property. Likewise, we understand the devastation these fires cause to animal lives and their habitat.

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New eComment for Planning Commission Hearing

Ruth EpsteinBaak submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Having lived in Valley Center for 15 years I am well aware of the omnipresent fire hazard and limited ways of escaping. I am adamantly opposed to this high density housing project.

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New eComment for Planning Commission Hearing

Sara Frank submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Way too much congestion already, among many other things. NO to Lilac Hills Project!

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Sharon Harlow submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: This is the same development we VOTED against. There are no plans by developers to improve roads, provide traffic stops, or lights, to prevent accidents on a road that sees thousands of car, trucks and every size of commercial vehicle all on a single lane. There is no plan for fire evacuations. I’ve already experienced a time when the freeway was blocked, so people tried to use this neighborhood to avoid the freeway. Roads were blocked in every direction. Don’t allow more vehicles here!

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New eComment for Planning Commission Hearing

Sue Carnall submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: I oppose the Lilac proposed development. Fires, fires, and fires. We never have more fire stations.

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Dear Chairman Barnhart:

Please vote yes for Lilac Hills Ranch, we are desperate for housing. I have four daughters and there is no place that is viable for them to purchase nearby. It would bring so much value to the neighborhood as a fire safe project, not to mentioned the road improvements.

I have kids at Sullivan Elementary and we need the developers help to improve evacuations in case of another fire, we want and need that new fire station they will build.

As a neighbor we can’t wait for Lilac Hills Ranch to be built and would greatly appreciate your support.

If you would like to talk further never hesitate to contact me on my cell below. We thank you and appreciate your efforts for our region.

Liz

Elizabeth Jaeschke de Buenrostro

5256 S. Mission Road, Suite #307 (River Village Center)
Bonsall, Ca 92003
This is exactly what San Diego County needs. Reasonably priced homes in San Diego County not Riverside. I am sure that having people that work in San Diego and live in San Diego will have more sense of community that living in one County and working in another. These developers are committed to get things done right and have this community be a gem in north county. The jobs, recurring taxes for the County and sense of community. Take a field trip to San Elijo. Why wouldn’t you want a project of convenience and community in our back yard. Thank you for approving Lilac Hills Development.

Greg Whistler
Business Partner
Chicago Title
1-760-715-2882

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Dear Ms. Jimenez and the Planning Commission,

Would you please help to clear this impasse by eliminating the requirement for Lilac Hills Ranch to acquire 32 easements along a short segment of West Lilac Road to ensure vegetation management. The County Consolidated Fire Code, Section 4907.2.1 provides all the legal authority for the County to do this directly.

Thank you,

Guy Mangiamele
Hi. My name is James Gordon and I am one of the co-leaders of the Community team that opposes the Lilac Hills Ranch project.

I am also the individual who communicated on behalf of the Community with the Planning Commissioners during the 2015 hearings, as well as coordinating the off site visit to the Lilac Hills Ranch site. I also worked with the Commissioners on coordinating speaker timing and protocol during the 2018 hearings.

The reason I am introducing myself is in case there is a need for a member of the Community to speak on behalf of the Community during Friday's hearing, I would be responsible for taking that lead. As the applicant has a lead person, the Community should also have a lead team member.

My email is above and my mobile number is: 415.852.1086. I will also be attending the dress rehearsal tomorrow morning at 10:00.

Mark Wardlaw, Mark Slovick and a number of the Commissioners know me and hopefully will let you know that I have been good at coordinating a number of efforts on behalf of the Community with the County team.

Thanks Much. James
September 18, 2018

Via e-mail (David.Hall@sdcounty.ca.gov; mark.wardlaw@sdcounty.ca.gov; Sarah.Aghassi@sdcounty.ca.gov)

San Diego County Board of Supervisors  
Clerk of the Board of Supervisors  
1600 Pacific Highway, Room 402  
San Diego, California 92101

Mark Wardlaw  
Director  
County of San Diego Department of Planning and Development Services  
5510 Overland Avenue  
San Diego, CA 92123

Sarah Aghassi  
Deputy Chief Administrative Officer  
County of San Diego Land Use and Environment Group  
1600 Pacific Highway Room 212  
San Diego, CA 92101

Re: Demand to Remove all General Plan Amendment Projects Relying on Out-of-County Offsets From Board of Supervisors’ Agendas

Dear Honorable Supervisors, Mr. Wardlaw, and Ms. Aghassi,

On behalf of the Sierra Club, the law firm of Chatten-Brown & Carstens submits this letter regarding the San Diego Superior Court’s September 14, 2018 issuance of a stay and injunction. As a result of the Court’s order, the County must not consider for approval any General Plan Amendment projects that rely upon the out-of-County offset program set forth in Mitigation Measure M-GHG-1 until there is a hearing on the merits of the Sierra Club’s and Golden Door’s challenge to the County’s 2018 Climate Action Plan, and beyond that if the relief sought in the lawsuit is granted.

The Court’s ruling provides, in relevant part:

[Insert Court’s ruling text here]
The motions for a stay and alternative preliminary injunction are granted. The County is prohibited from using its new offset proposal for approvals of pending General Plan amendments until the court’s final judgment in these proceedings or further order of the Court of Appeal.

... [I]t is in the public interest to ensure that the carbon offset program in M-GHG-1 is consistent with the County’s General Plan that requires GHG reductions to occur within the County before allowing reliance on the new program. In addition, the public interest is thwarted if the project proponents have to vacate, undo or redo the development of their projects if M-GHG-1 is found to be unlawful at the merits hearing. In other words, project proponents who proceed based on development approvals granted between now and final judgment may be faced with restoration/remediation expense, as well as the expense of starting the approval process over again.

In its ruling, the Court also concluded that the Sierra Club and Golden Door have demonstrated a likelihood of prevailing on the merits. Since the Court’s injunction is prohibitory (it preserves the status quo immediately prior to the County’s development of the out-of-County offset program), any appeal by the County of the Court’s issuance of the injunction would not result in a stay of the injunction.

Since “[t]he County is prohibited from using its new offset proposal for approvals of pending General Plan amendments,” the stay/injunctive relief prohibits the County from approving any General Plan Amendment (“GPA”) project that relies on out-of-County carbon offsets. We have been informed by a reporter that Newland Sierra’s representative believes that this stay/injunction does not apply to Newland Sierra. Newland Sierra is exactly the type of project to which the stay/injunction applies.

In the Sierra Club’s application for a stay/preliminary injunction, the Sierra Club mentioned that the County could still grant conditional approvals to projects even if a preliminary injunction were issued. However, upon further review of the relevant section of the CEQA Guidelines (§15233, subd. (b)), the reference in the Guidelines to conditional approvals only refers to “the responsible agency,” not the “lead agency.” Here, the County is the lead agency, not the responsible agency. Therefore, CEQA does not authorize the use of a conditional approval process by the County. In the event the County intends to consider using a “conditional approval” process, we request that the County provide the Sierra Club advance notice of such an intent so that we can request the Court’s adjudication of the propriety of the County taking such action.
On September 11, 2018, prior to the Court’s issuance of the stay and preliminary injunction, the County’s Planning and Development Services department notified the public that the Board of Supervisors would be considering the Newland Sierra Project for approval on September 26, 2018. The County’s website also indicates that Lilac Hills Ranch, Otay Ranch Village 14 and Planning Areas 16 and 19, Warner Ranch, and Property Specific Requests may also be considered in 2018.

The County must delay consideration of any GPA projects that rely upon out-of-County offsets until the stay/injunction is dissolved. Since the merits hearing in the Sierra Club v. County of San Diego case will be heard at the end of December 2018, the County should not calendar for consideration any GPA projects that rely on out-of-County offsets in the 2018 calendar year. It is in no one’s interest for the County, the applicant, and the public to expend precious time and resources addressing the currently proposed projects when there is an injunction in place and a substantial likelihood that the use of out-of-County offsets will be determined to be illegal.

Should the County approve any GPA projects that rely on out-of-County offsets, the Sierra Club will consider filing a motion for a contempt order against the County.

Please confirm, by the end of business on Friday, September 21, 2018:

1) Whether the County will be removing from the Board of Supervisors’ agendas all GPA projects that rely upon out-of-County offsets; and

2) Which GPA projects the County acknowledges are impacted by the Court’s stay and preliminary injunction.

Thank you for your prompt attention to this matter.

Sincerely,

Josh Chatten-Brown

cc:

Claudia Silva, Assistant County Counsel
Joshua Heinlein, Senior Deputy
Chairman Barnhart and San Diego County Planning Commissioners,

It was my distinct honor and privilege to serve as a San Diego County Planning Commissioner for over twenty-four (24) years. During that time, I probably reviewed over 1000 staff reports for projects ranging from cell towers, pet hotels, the General Plan Update to some of the largest master planned communities in San Diego County. I have always respected staff’s time and expertise when they provided the Commission with their staff reports and their testimony in support of their recommendations to me and the other Commissioners. Even though each project was different and/or unique it its planning, its location, and its impacts. But, there was a consistency to its conditions, mitigation measures, and how it was processed through the county. Ultimately, my decision to support or deny a project was based on staff testimony, the Community Group, the project proponents, and testimony from the public.

Over those 24 years, I have never had a project that had received more staff review, scrutiny, public testimony, and general interest as Lilac Hills Ranch. I was a Planning Commissioner when Lilac Hills Ranch came before us in 2010, and then again in 2015. I believed it was a well designed and thoughtfully planned project and I was happy to recommend it for approval to the Board of Supervisors. I was still on the Commission in 2018 when staff brought Lilac Hills Ranch back seeking our opinion on whether to rehear the project or send it on to the Board of Supervisors. I, along with the other Commissioners, believed the improvements and the inclusion of ALL of our 2015 conditions made the project even better and there was no need to delay Lilac Hills on its journey to the Board of Supervisors with our Commission’s recommendation. So, you can imagine my surprise that I heard that after a year and a half of working with staff on fire related issues, staff had changed their mind and was now recommending the Board of Supervisors deny the project over easements? In 24 years of service to the public as a Planning Commissioner, I have never heard, seen, or required a project to obtain offsite easements prior to receiving Planning Commission or Board of Supervisors approval. This is unprecedented and highly unusual to say the least. When I made an inquiry about this situation and read the Directors letter of May 2020, I still don’t understand why Lilac Hills can’t simply be conditioned to secure right of way, if necessary. No project – new or old, large or small, should be treated any differently. I still believe that the Lilac Hills Ranch would be a welcomed addition to San Diego and I would urge your commission to condition the project appropriately and recommend to the Board of Supervisors that they approve Lilac Hills Ranch.

Sincerely,

Leon Brooks
County Planning Commissioner, 1994-2018
June 10, 2020

Douglas Barnhart, Chairman
and Planning Commission members

Via Email: Ann.Jimenez@sdcounty.ca.gov

Re: Response to June 12, 2020 Staff Report, Update on Lilac Hills Ranch

To Chairman Barnhart and Planning Commissioners:

As owner and applicant, we submit this letter to clarify and correct the record in response to the County Planning & Development Services’ June 12, 2020 report updating the Planning Commission on the “fire safety issues” associated with the Lilac Hills Ranch planned community.

1. **Summary of Staff Position**

   Staff’s position, in summary, is that Lilac Hills Ranch presents a risk of entrapment along an off-site segment of West Lilac Road for area residents during an evacuation and that we must obtain easements from property owners along that road segment; and that without the easements, staff has “no guarantee” the roadside vegetation management will occur. (Staff Report, p. 2.) Despite prior support, staff now takes the position that Lilac Hills Ranch is “unsafe” and is recommending denial of the project at the June 24 Board of Supervisors’ meeting.

2. **Applicant’s Proposed Solutions**

   First and foremost, staff’s fire safety claim is wrong. Our team, including 8 fire experts, would never ask any Commissioner or Board member to vote for a project that does not meet fire safety standards or that is not a fire-safe community. The issue remaining is not if, *but how*, to implement staff’s fire safety requirement. Specifically, the issue is *how* to ensure vegetation management can be implemented and maintained on the off-site segment of West Lilac Road identified by staff. To break through the impasse with staff, we have proposed solutions.

   **A. Preferred Solution**

   Our *preferred* solution is for the Planning Commission to support and recommend a post-Project condition of approval recognizing that the County already has legal authority to implement the Consolidated Fire Code requirements for roadside vegetation management (see sec. 4907.2.1), and require the applicant to provide two million ($2,000,000.00) dollars in funding, plus a project assessment, to implement and maintain vegetation management in perpetuity along the segment of West Lilac Road identified by staff. Under this condition, all the subject funds will be directed to vegetation management.
B. Solution 2

Alternatively, if the Commission agrees with staff that some or all of the subject easements are needed to recommend approval, we ask the Commission to support and recommend a post-Project condition based on the applicant’s best-efforts obligation to obtain the easements. In such case, the costs of acquiring the easements would be determined by an MAI appraiser and the costs would be credited against the applicant’s commitment to pay two million dollars toward vegetation management. Further, as to easements that cannot be obtained, the County or the fire authority would implement the roadside vegetation management pursuant to the section 4907.2.1 of the Consolidated Fire Code, using funds from the applicant’s vegetation management funds. Under this condition, which is not our preference, a portion of the funds would be used to appraise and acquire the easements that, in our view, are neither required nor necessary.

Lastly, an important fact is that this solution is consistent with several other Project conditions that have already been imposed on the Project, located within other independent jurisdictions or within areas outside of the Project’s control, including: (1) construction of a Deer Springs Fire Protection District Fire Station; (2) improvements to the CALFIRE State-Owned Miller Fire Station; (3) providing clear space easements along West Lilac Road and Circle R Drive; (4) improvements to Mountain Ridge Road; (5) improvements to Caltrans facilities; (6) improvements to water and sewer facilities within the Valley Center Municipal Water District jurisdiction; (7) building a K-8 school; and (8) dedications and wetland permits with federal and state agencies. These are all pre-approval Project conditions and post-approval actions that involve obtaining rights-of-way, agreements, permits, and approvals from parties and jurisdictions that are not subject to “County authority.”

(Note: The CALFIRE Miller Fire Station, which would be improved as a condition to the Project, is situated adjacent to the northerly boundary of Lilac Hills Ranch and according to CALFIRE Unit Chief Tony Mecham, is considered “one of the essential priority stations” for wildland fire prevention and suppression (see Attachment 8). The station is strategically situated, on West Lilac Road, to respond to vicinity wildfires and evacuations, and it is in addition to the Project’s on-site new fire station.)

In short, our solution can be resolved by one of the proposed conditions (see Attachment 7 for the two proposed conditions).

3. Applicant’s Additional Proposed Solution

We have one additional request. Staff has said that the additional fire safety features made to the Project require recirculation of the Project’s Environmental Impact Report (EIR). We disagree.

As in 2018 before this Commission, we showed that the Project’s fire safety enhancements were not “substantial modifications.” As in 2018, we would like to show that these added features do not raise
new or more severe significant environmental effects; and nothing requires or justifies yet another recirculation of the Project’s EIR.

Accordingly, we ask the Commission to pursue the procedure established in 2018; specifically, we ask the Commission to schedule a public meeting limited to staff’s recirculation claim, before the Project is sent to the Board on June 24th of this month. (See Attachment 6 for further information addressing recirculation).

4. Executive Summary

In response to staff’s June 12th report and for context, we provide this executive summary.

Lilac Hills Ranch was deemed fire safe by County staff and the Planning Commission with input from the County Fire Authority in 2015 and reaffirmed in 2018. Since 2018, we have agreed to add several additional features to make the Project and surrounding region even safer. Now, the Project would:

1. Construct a robust road network and adds new road lanes before any Project home is occupied;
2. Fund $2 million to implement vegetation management along offsite designated evacuation routes;
3. Fund vegetation management along existing offsite evacuation routes into perpetuity through the Project’s HOA;
4. Increase defensible space, exceeding code requirements, around the Project and adds strategically located heat-deflecting walls;
5. Include hardening features for all new homes above and beyond all local and state regulation;
6. Build three strategically placed hardened structures to provide “Temporary Areas of Safe Refuge.”

(See Comparison Table of 2015-2018-2020 Recommendations [Attachment 1].)

The result of this 18-month collaboration with the County staff is a punch list of thirteen (13) final requests by the County Fire Authority. We have agreed to each of the County Fire Authority’s 13 final requests. The one remaining determination is how (not if, but how) to implement the last of these 13 requests. Specifically, how to implement vegetation management on a segment of West Lilac Road east of the Project.

County staff’s position is that we must acquire easements on ALL 32 properties along this road segment, irrespective of whether vegetation is present, to ensure that vegetation management will occur.
We disagree with this unusual “all-or-nothing” requirement because the County already has established fire safety code provisions to require roadside vegetation management along roads that pose risk. Staff’s position implies that the County lacks the legal authority to keep County roads safe from combustible vegetation. The County Consolidated Fire Code says otherwise. Section 4907.2.1 of the Consolidated Fire Code states:

“The [fire authority having jurisdiction] may require a property owner to modify combustible vegetation in the area within 20-feet from each side of the driveway or a public or private road adjacent to the property to establish a fuel modification zone. The [fire authority having jurisdiction] has the right to enter private property to ensure the fuel modification zone requirements are met.” (Italics added.)

In San Diego County, fire safety is a community responsibility. We each must do our part.

Existing law mandates that property owners modify combustible vegetation within 20 feet of a roadway adjacent to their property (what the Code calls a “fuel modification zone” or “FMZ”). Almost all residents recognize the importance of fire safety, and regularly fulfill this responsibility.

However, in the rare case where a property owner refuses to meet his or her obligation, the Code clearly enables the fire authority “to enter” the property to ensure “that FMZ requirements are met”. This is a critical component of the Code, since there cannot be, nor is there, an “opt-out” option for County residents.

The Code could not be more clear as to the fire authority’s right to enter property when necessary to ensure safety. This section does not require easements to be obtained. Easements are neither required nor necessary.

The County’s request for easements also deviates materially from County precedent for land use project approvals. We are unaware of any other project in the County with this “easement” requirement. Adopting this new staff precedent for easements will greatly discourage new housing in our housing-starved County, because a single property owner will effectively hold veto power over the entire land use process, simply by refusing to grant one easement.

We ask the Planning Commission to assist. We have proposed solutions to break through the impasse with staff. The proposed solutions, combined with the Project’s fire safety enhancements, will improve fire safety for the Project and surrounding region and serve as a model for the future.

**Applicant Response to Staff Report**

In 2015, staff recommended Project approval to the Planning Commission, and the Planning Commission, after three public hearings, including a field trip to the Project site and surrounding community, recommended approval of the Project as modified. In 2018, with no change of position from County staff, the Commission directed staff to expeditiously send the Project to the Board of Supervisors
with the Commission recommendation for approval. However, in 2020, staff is now recommending denial of the Project.

So, what changed?

According to the County June 12, 2020 staff report, two “significant” changes have occurred. First, staff states that, in 2016, the County Fire Authority began providing fire prevention services to the District pursuant to a County Fire Authority/District agreement. Second, staff states that, in 2018, California experienced the deadliest fires in the State’s history, resulting in a “focus on fuel modification along roads,” additional fire safety regulations, and evacuation planning. Neither “change” justifies staff’s unprecedented demand for easements from Lilac Hills Ranch. We address the two “changes” below.

1. **Staff’s First “Change” — The 2016 County/District Fire Prevention Agreement**

According to this statement, County staff implies that there are new codes and standards that the Lilac Hills Ranch project has not yet met, however, the Project has met or exceeded every federal, state, and County Code requirement. In addition, for the last two years, we have worked with County staff, the County Fire Authority, and the Sheriff’s Department, and agreed to implement the agencies’ requirements to enhance fire protection, prevention, and evacuation measures. (See Comparison Table of 2015-2018-2020 Recommendations [Attachment 1].)

In July 2018, at a recent County project presentation to the Board, County Fire Chief Tony Mecham commented on the adequacy and thoroughness of that project’s Fire Protection Plan, for the following reasons:

- Three lanes (allows us two lanes for evacuation, still keeping one lane open for emergency vehicles)
- Water supply system (over double what is required in the fire code of nearly 5,000 gallons a minute)
- Number one greatest thing we can do is fuels modification
- [Hardened] community center - we are more and more moving people very short-term to what we refer to as a temporary refuge point moving the people in greatest danger on the perimeter to a short-term point within the project so that we don't have to put them on the road
- So, all of them are included in the fire protection plan and I feel very comfortable with what they've done”

The County Fire Chief’s comments apply with equal or greater force to the fire safety enhancements in place for the Lilac Hills Ranch project:
• An extra travel lane (intermittent turn lane) for evacuations along two separate road segments;
• Water supply system (over double what is required in the Fire Code of nearly 5,000 gallons a minute);
• fuels modification, including within 20 feet from each side of West Lilac Road;
• [Hardened] community center.

In addition to the above short list, the Lilac Hills Ranch project provides all the following:

• Five means of ingress and egress;
• Automatic gates with 24/7 guard;
• Building the Project’s internal road circulation network prior to first occupancy;
• Multiple “Areas of Safe Refuge” within the community that offer contingency for temporarily sheltering in place if full evacuation is considered unsafe for residents and large animals;
• $2 million in funding for offsite fuel modification and offsite hardening of existing residences;
• Constructing non-combustible heat-deflecting walls adjacent to internal native fuels (in addition to the 100-foot defensible space) within the Phase 1 development area (and optionally Phase 2);
• Implementing 150-foot fuel modification zones adjacent to native open space within the development areas for Phases 3 through 5;
• Installing a Regional Weather Center Station with battery backup at the Miller Station prior to first occupancy;
• Building a hardened cell/communications tower with battery backup to ensure functioning communications for several days should power be lost;
• Providing funding to County Fire Authority, Community Risk-Prevention Division prior to first occupancy to construct signage to disseminate real-time conditions and messages to evacuees, such as remotely changeable message signs;
• Undergrounding existing overhead powerlines (onsite and offsite) to remove significant ignition source and evacuation vulnerability;
• Improving Miller Station (prior to first occupancy in the Phase 1 development area for use until the additional permanent fire station is built on site);
• Creating a Fire Safe Council to be managed through the HOA.

The Lilac Hills Ranch project includes a District-approved Fire Protection Plan, and the plan states:

“If the recommendations in this Plan are implemented, this development will not expose people or habitable structures to a significant risk of loss, injury or death. Following the recommendations would also decrease the risk of loss for surrounding existing uses. As proposed, the project is not anticipated to contribute to a significant cumulative impact relative to wildland fire risk.”

(Project Fire Protection Plan, p. 47, italics added.)

Importantly, the Deer Springs Fire Protection District’s approved Fire Protection Plan already ensures roadside vegetation management on either side of public roadways per the County Consolidated Fire Code and State Code. The Project’s approved Fire Protection Plan states:

“The proposed project shall provide fuel modification on either side of public roadways, pursuant to the County’s Consolidated Fire Code and the California Fire Code for clearance of brush and vegetative growth from roadways.” (See Fire Protection Plan, p. 35, italics added.)

In compliance with the County’s required Project Facility Availability Form, the Deer Springs Fire Protection District has confirmed that: (a) the Project is in the District and eligible for service; (b) the District’s fire protection facilities are currently adequate or will be adequate to serve the proposed Project; and (c) the District has imposed conditions that would otherwise be attached to the Project’s Tentative Map Resolution making them enforceable by the County as the lead agency.

County staff’s reference to the County Fire Authority’s agreement to provide fire prevention services to the Deer Springs Fire Protection District is of no consequence; and it is not a material “change.” Lilac Hills Ranch meets or exceeds all Code requirements, ensures substantial funding, includes multiple evacuation routes, and provides funds for roadside vegetation management along the subject segment of West Lilac Road (in addition to Circle R Drive). The County or the fire authority has the legal authority (and now the funding) to ensure roadside vegetation management under section 4907.2.1 of the County Consolidated Fire Code and the Project’s Fire Protection Plan.

Further, if the County/District fire prevention agreement were to terminate or expire (an extremely unlikely outcome), it is reasonable to assume the County will ensure that any successor agency would fulfill its vegetation management responsibilities and not put residents at risk.

2. Staff’s Second “Change” — The 2018 Wildfires

Staff states that the 2018 wildfires significantly changed the “focus” to “fuel modification along roads, additional fire safety regulations, and analysis of evacuation planning.” While there have been changes, the Project, at the insistence of staff, the County Fire Authority, and the Sheriff’s Department,
also adapted and further enhanced its fire safety features in 2018 through 2020. (See Comparison Table of 2015-2018-2020 Recommendations [Attachment 1].)

Additionally, in 2019, the Project commissioned the Wildfire Risk Assessment, prepared by Dr. Christopher Dicus, PHD (July 15, 2019 [Attachment 2]). In that assessment, Dr. Dicus studied the 2018 wildfires against the Project and its setting, and documented the critical differences between the Project and the northern California wildfires:

“[T]he proposed LHR development will be significantly safer than areas that were recently burned in northern California due to the myriad of mitigation factors … included in LHR.

First, changes in the fuels in LHR will be safer at multiple scales than in recently destroyed communities in northern California. At the community-level, the lands in and around LHR are dissected by irrigated agricultural lands that will impede active fire spread; further, at the boundaries of LHR, an irrigated fuel management zone will extend up to 100 ft. around the community. At the smaller parcel-level scale, defensible space is designed around all structures, will be vigorously enforced, and funded by the LHR … [HOA]. In contrast, the community of Paradise had contiguous fuels that surround the community and lacked any appreciable defensible space around buildings and did not have an HOA to enforce and fund ongoing fuel modification and defensible space.

Of greatest importance to risk reduction, the buildings in LHR will be built to stringent building codes that require ignition-resistant construction of vulnerable components, including standards for roofing, siding, windows, vents, decks, and others. In contrast, because Paradise was largely comprised of fire-prone buildings that were constructed 40 or more years before wildfires were considered in building codes, homes in Paradise easily ignited via burning embers and subsequent house-to-house spread ….

As an alternative contingency, the community will also be designed so as to enable a passive shelter-in-place approach for residents and neighbors should evacuation be phased, halted or precluded entirely. Contrast that with Paradise, where authorities were unprepared to evacuate the entire town simultaneously, leading to confusion on when residents were to leave, long traffic delays in perilous conditions and subsequent multiple fatalities during evacuation ….

Additionally, Lilac Hills Ranch is not like Paradise or other communities that were built before current fire standards. The LHR project includes a multi-layered fire protection system that is based on ignition resistant buildings and landscapes,
adherence to stringent codes, fire-fighting water availability, swift emergency response, and a sound evacuation planning that includes a contingency option for residents who may be directed to temporarily shelter within the community during a wildfire evacuation. \textit{LHR, like other new, master-planned communities, should not be compared with older, less restrictive communities} that were not built to the latest codes and ongoing maintenance. \textit{Other new, nearby communities have performed extremely well during wildfires and given the LHR’s location, surrounding fire environment, and proposed fire protection plans, it is anticipated that the project will represent lowered risk to both LHR residents and nearby neighboring communities.”} (Wildfire Risk Assessment, Executive Summary, pp. ii-iii.)

Consistent with the Project’s Wildfire Risk Assessment, in June 2019, County Fire Chief Tony Mecham (Board of Supervisors, June 26, 2019) confirmed the differences between the 2018 wildfires and the San Diego region:

\textit{“Let me talk just for a moment about the Camp Fire specifically and Paradise. This is a community that was built in — incorporated in 1979 with 20,000 people. At the time of the fire there were 26,000 people in the community of Paradise. So, most of the existing structures were existing from the 1970s. There was no formal fuel modification done around that community.}

\textit{It sat on the cornerstone of two major river drainages. There were oaks and pine trees, what we call thousand hour, much larger fuels spread throughout the community. They had done what is known as a road diet within the community to restrict travel lanes, and it was nearly 13 miles out from the community of Paradise until you hit east Chico to a point of relative safety.”}

The 2018 wildfires heightened the scrutiny for housing development in San Diego County. However, the Lilac Hills Ranch project completed a detailed study of the differences between the fire ecology, factors that influence wildland fire behavior, building requirements, fire mitigation, preparedness measures, and other factors that differentiate communities devastated in the 2018 wildfires in northern California from Lilac Hills Ranch. (See Lilac Hills Ranch Wildfire Risk Assessment, July 2019, Attachment 2.) The Project meets and exceeds all heightened requirements imposed since 2018.

3. Other Staff Inconsistencies

\textit{Inconsistencies Over Location of Easements.} In a letter dated January 8, 2020, County staff requested the applicant to secure 20-foot easements on \underline{only one side} of West Lilac Road ”…on the northeast side of West Lilac Road between Covey Lane northwesterly to the proposed Project Boundary.” However, between January 9th and January 29th, staff and the County Fire Authority
changed their requirement three different times without explanation, and now in the June 12th staff report, seem to again change the requirement from what they requested in January. (See email from Larry Hershfield to Mark Wardlaw, dated January 29, 2020 [Attachment 3].) These inconsistencies necessarily hamper resolution with staff.

50 v. 32 Properties Inconsistencies. In addition, staff’s June 12th staff report now states that the applicant must provide easements along West Lilac Road for 50 properties. (Staff Report, p. 2.) However, there are 32 properties along the staff-identified West Lilac Road segment, not 50. These kinds of inconsistency frustrate the resolution process with staff.

Evacuation Study Assumptions. Staff’s May 6, 2020 letter to the applicant states that the County Fire Authority “disagrees with many of the assumptions” in the applicant’s evacuation study, stating that the study wrongly includes intersection traffic controls and the diversion of non-essential traffic from the area during an evacuation. (May 6, 2020 letter, p. 1.) The County Fire Authority’s position directly conflicts with the County’s adopted Operational Area Emergency Plan, 2018 (Annex Q).

Annex Q expressly provides that its “overall objectives…are to…control evacuation traffic.” (Annex Q, p. 9.) Additionally, Annex Q states that “the purpose of a phased evacuation is to reduce congestion and transportation demand on designated evacuation routes by controlling access to evacuation routes in stages and sections.” Annex Q provides that one of the responsibilities of the County Sheriff is to “[p]rovide traffic control measures for evacuation effort.” Annex Q references the importance of traffic controls in the following sections:

- Annex Q, page 7 “law enforcement agencies are the primary lead” on evacuation.
- Annex Q, page 9 “control evacuation traffic”
- Annex Q, page 9 “SDSD is the lead agency for evacuations of the unincorporated areas of San Diego County”
- Annex Q, page 13 “coordinate traffic flow (use of signals, physical barriers), and law enforcement to assist with traffic controls
- Annex Q, page 16 secure affected area and limit access
- Annex Q, page 17 traffic coordination and timing
- Annex Q, page 18 allowing phased evacuation including controlling evacuation routes in stages and sections
- Annex Q, page 18 allowing use of road barriers
- Annex Q, page 31 identifying the Sheriff as the “County Evacuation Coordinator”
• Annex Q, page 33 identifying the Sheriff Department’s roles as including traffic and evacuation points and providing traffic control measures

• Annex Q, page 40 instructing law enforcement agencies to conduct evacuation operations “in the field”

• Annex Q, pages 56-57 identifying evacuation route determinations and “road capacity” coverage matters

County Sheriff Commander Dave Brown further confirmed the use and importance of traffic control and management during evacuations: “[t]here is traffic. We are going to be there. We get ahead of these things. We take over the intersections.” (May 24, 2018).

**Staff’s Consultant Report (Rohde).** Staff’s June 12th report also refers to a consultant-prepared report to “corroborate” staff’s position that the use of West Lilac Road is not an adequate evacuation route because it “presents risks of entrapment.” (Staff Report, p. 2.) This is clearly erroneous.

First, with the Project, the existing community and project residents will have at least five additional routes to circumvent entrapment, obstruction, or delay concerns. Further, we have agreed to provide funds for roadside vegetation management along West Lilac Road, and have ensured continued vegetation management funding in perpetuity through HOA assessments.

Moreover, the report relied on by staff ignored or omitted studies and essential information that we had been submitted months ago to staff and the County Fire Authority. According to the technical memorandum from the former County Fire Marshal, Gregory Schreiner [Attachment 4], who reviewed the report:

“[T]he consultant did not use, reference or rely upon the above-mentioned Wildfire Safety Compendium (Vol I and II) that the Applicant assembled over the preceding 16 months prior to issuing this final report. As such, the Rohde Report is invalid and does not serve to accurately inform either county staff or county decision making bodies as to critical project design, fire safety or evacuation features and therefore, the projects overall fire safety. This Report in my professional opinion, should be removed from the record, as it does nothing to serve or inform either the County or the applicant.” (See technical memorandum from former County Fire Marshal Gregory Schreiner, p. 2 [Attachment 4].)

In addition, Dudek (Mike Huff) has completed a technical memorandum addressing the May 2020 report from Rohde and Associates (see Attachment 5). The Dudek memorandum points out where the Rohde report is clearly erroneous, particularly the baseless conclusion that West Lilac Road is not an adequate evacuation route — a conclusion that should shock the conscience of the Planning Commission and the public, all of whom assume rightly that the County’s public roads are safe, or will be made safe, during an evacuation. This Project, if implemented, will make West Lilac Road a safer route for residents
and the community in the event of an evacuation, and the Dudek memorandum (Attachment 5) and other Project reports confirm that fact.

**Nelson Way Inconsistencies.** Staff has been inconsistent regarding the use of Nelson Way as an alternative egress route. Most recently, in the June 12th report, staff states it has evaluated the road and determined “it is an inadequate emergency evacuation route.” (Staff Report, p. 2.) This is clearly erroneous.

In July 2019, we were informed by County staff, at a meeting with the County Fire Chief, that the County would require an additional access road from the Project’s Phase 5 for emergency access and evacuation. At the meeting, Nelson Way was identified as the preferred route.

During the months following the County’s July 2019 request to add Nelson Way, our team met with the County on several occasions, and at the County’s request, prepared and submitted to staff a binder of extensive information describing the road improvements, access rights, environmental review, engineering plans and specifications, and safety evaluations from former City and County Fire Marshals.

In the January 8, 2020 letter to the applicant, staff addressed Nelson Way and said, “This access route has value and shall be improved to private road standards prior to occupancy of the first occupancy of Phase 1. Since Phase 1 will utilize the Miller Station, a road connecting Nelson Way to the Miller Station shall also be required prior to the first occupancy of Phase 1.” (Italics added.) Further, the residents that we have contacted along Nelson Way welcome the roadway improvements at no cost to them. Also, County staff has acknowledged that Nelson Way must be improved to private road standards, so there should be no basis for staff to conclude the road is now “steep, narrow, and winding,” when, as here, the road would be modernized to the County’s own standards. This is non-sensical.

**General Plan Consistency.** In 2015, County staff reviewed the Project’s Specific Plan to “ensure that the proposed General Plan Amendment is in the public interest and would not be detrimental to public health, safety, and welfare.” (Planning Commission Staff Report, 2015.) County staff “reviewed all of the 473 goals and policies in order to determine those that were applicable to the project and determined it to be consistent.” (Id.)

Though not mentioned in the June 12, 2020 staff report, staff has indicated that its General Plan consistency determination may be changing or has changed. This potential shift in position, though not referenced in the Planning Commission June 12th staff report, also frustrates the applicant’s ability to effectively resolve the primary issue presented, namely whether easements are required along the identified segment of West Lilac Road. Please see the updated General Plan Consistency Analysis (Attachment 9), which provides responsive information and confirms staff’s prior General Plan consistency determination.) In addition, the Project’s Wildfire Risk Assessment (Attachment 2), pages 25-26, provides an assessment of the features that make the Project consistent with the General Plan.
Staff’s Recirculation Claim. County staff states that if the Board does not approve its recommendation to deny the Project and remands the Project back to staff for further analysis, the Project’s EIR must be “revised and recirculated” under CEQA. (See County staff May 6, 2020 letter, p. 2.) The statement is clearly erroneous, and some background is provided for context.

On June 8, 2018, County staff recommended that the Planning Commission “determine that the changes to the Lilac Hills Ranch project that have occurred since the Planning Commission provided a recommendation in 2015 are “substantial modifications” under the Government Code and remand the project back to the Planning Commission for a recommendation on the 2018 Project.” (See Planning Commission Staff Report, June 8, 2018, page 1-22.)

The Planning Commission denied staff’s recommendation by a unanimous vote of 6-0, and instead recommended that the Project be “expeditiously” sent to the Board of Supervisors. However, to date, County staff has yet to forward the Planning Commission’s 2018 recommendation to the Board.

That was two years ago. In the June 8, 2018 Planning Commission staff report, staff described the extraordinary public review that this Project has undergone, over a 10-year period:

“The Lilac Hills Ranch Project Draft EIR was first circulated for public review in July 2013. Thereafter, a Revised Draft EIR dated June 12, 2014 was recirculated for public review from June 12, 2014 through July 28, 2014. All interested persons and organizations had an opportunity during this time to submit their written comments to the County. Responses to comments were prepared and the 2015 Draft FEIR, along with all associated project entitlements, was presented to the Planning Commission at three Public Hearings on August 7, 2015, August 12, 2015, and September 11, 2015. On September 11, 2015, the Planning Commission recommended approval of the 2015 Project subject to a number of modifications to the project design as stated in the Planning Commission’s recommendations and 2015 staff report.” (See Planning Commission Staff Report, p. 1-20.)

In addition, the Project’s Draft EIR was circulated for a third time on February 19, 2018. If the County should proceed with another recirculation of the materials that are being published for the current June 12, 2020 Planning Commission hearing, this would be the fourth document circulated for public review.

In summary, over the past 10 years, the Project will have undergone 10 public hearings (including the upcoming Board hearing); one EIR public scoping meeting, and three additional EIR CEQA public review processes, with responses to comments, for a total of 14 separate opportunities for the public to provide input. Further, the Applicant has provided the latest documentation to the County, which is now available for public review, on the County’s website.
Lastly, information has been added to the Final EIR. However, that information is not “significant new information” for purposes of CEQA’s recirculation standards because it serves only to: (a) clarify or amplify information already presented in the draft EIRs; (b) respond to public/agency comments, which is a recognized part of the CEQA process; (c) further reduce identified environmental effects without changing any significance thresholds or significance findings; (d) refine or clarify the timing and locational requirements of existing mitigation measures; (e) enhance fire safety with additional design features and/or conditions; (f) update regulatory requirements; (g) describe the Project changes to the design as recommended by the Planning Commission and/or County staff, all of which were already part of the recirculated 2018 DREIR; and (h) disclose other minor changes that were subjected to recirculation in the 2014 DREIR and the 2018 DREIR. (See CEQA Recirculation Memorandum [Attachment 6].)

We hope the Planning Commission reaches the following determinations:

1. The Project has done more in terms of fire safety and evacuation than any project in the County.

2. We agree with County staff over roadside fire safety; the disagreement is over how to implement the County Consolidated Fire Code roadside vegetation requirements. We agree 20 feet of roadside vegetation along the identified West Lilac Road segment is needed now and, in the future, and that there must be certainty that it can occur and be maintained. Indeed, we have agreed to provide $2 million, plus an HOA assessment, to ensure funding for the roadside vegetation management in perpetuity. We just do not believe that staff’s request for easements is required or needed.

3. We respectfully request that the Commission condition the Project to implement one of the attached proposed conditions. (See proposed conditions [Attachment 7].)

4. Lastly, in addition to adding the proposed condition to a positive recommendation, this Commission recommend that the Project be sent to the Board as soon as possible after the June 24th hearing (whether or not the Project is presented at that hearing) without the need for an intervening EIR recirculation. Alternatively, if the Commission believes a hearing on the issue is necessary, we request this Commission schedule that hearing as soon as possible for the limited purpose of determining whether recirc is required.
Thank you for your consideration.

Sincerely,

Jon Rilling
Jon Rilling, Vice President
Village Communities, LLC

ATTACHMENTS:

Attachment 1 – Comparison Table of 2015-2018-2020 Recommendations
Attachment 2 – Wildfire Risk Assessment, by Dr. Christopher Dicus, PHD (July 15, 2019)
Attachment 3 – Email from Larry Hershfield to Mark Wardlaw (January 29, 2020)
Attachment 4 – Memo from Greg Schreiner, re: May 2020 Rohde Report
Attachment 5 – Memo from Dudek, re: May 2020 Rohde Report
Attachment 6 – CEQA Recirculation Memorandum
Attachment 7 – Applicant’s Proposed Conditions of Approval
Attachment 8 – Email from CALFIRE Unit Chief Tony Mecham, April 21, 2015
Attachment 9 – Updated General Plan Consistency Analysis (S-1.1, S-3.1 and S-3.6)

cc:  Mark Wardlaw (VIA Email)
     Mark Slovick (VIA Email)
     William Witt (VIA Email)
     Justin Crumley (VIA Email)
     Tony Mecham (VIA Email)
     Dave Nissen (VIA Email)
     Dave Sibbet (VIA Email)
     Sarah Aghassi (VIA Email)
     Larry Hershfield (VIA Email)
     Sam Hartman (VIA Email)
     Ann Moore (VIA Email)
     Mark Dillon (VIA Email)
ATTACHMENT 1
COMPARISON TABLE OF 2015 VS 2018 VS 2020
<table>
<thead>
<tr>
<th>Subject</th>
<th>2015</th>
<th>2018</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Roads</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Offsite Roadway Improvements</td>
<td>25</td>
<td>40</td>
<td>40</td>
</tr>
<tr>
<td>Sight Distance</td>
<td>The project is conditioned to provide adequate sight distance at the Covey Lane/West Lilac Road intersection and will be required to obtain an off-site easement for sight distance.</td>
<td>No change</td>
<td>No change</td>
</tr>
<tr>
<td><strong>Wastewater Alternatives</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sewer</td>
<td>A Wastewater Management Alternatives analysis was prepared for the project and identified four alternatives to provide sewer service to the project. [1-10]</td>
<td>No change</td>
<td>No change</td>
</tr>
<tr>
<td><strong>Right-of-way</strong></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Offsite Right-of-way</td>
<td>A number of the off-site improvements would improve existing conditions that do not currently meet County standards. The roadway improvements would also likely require the reconstruction of a number of private driveways off-site. Staff also acknowledges that the project would require permission for grading from private properties located off-site. [1-113]</td>
<td>No change</td>
<td>No change</td>
</tr>
<tr>
<td><strong>Fire and Medical Service</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># of additional safety measures</td>
<td>n/a</td>
<td>2</td>
<td>16</td>
</tr>
<tr>
<td>Fire Protection Plan</td>
<td>A Fire Protection Plan for the project was approved by DSPO. The plan details the locations and widths of appropriate fuel management zones, road widths, secondary access, water supply, and hydrant spacing, which would comply with the DSPO standards and County Consolidated Fire Code Standards. The Fire Protection Plan (FFP) identified measures necessary to adequately mitigate potential wildfire impacts.</td>
<td>No change</td>
<td>No change</td>
</tr>
<tr>
<td>5-Minute Travel Time</td>
<td>The project will be conditioned to meet the County’s General Plan five-minute travel time.</td>
<td>No change</td>
<td>1. Provides funding for fire station equipment and facilities that is more than double what is statutorily required by County; 2. Provides funding for fire staffing that is more than what is statutorily required by the County.</td>
</tr>
<tr>
<td>Evacuation Plan</td>
<td>An Evacuation Plan was prepared that determined that adequate precautions have been taken to provide safe and efficient evacuations in the case of a wildland fire. The Evacuation Plan includes both primary and secondary evacuation routes, which are accessed by a series of internal roadways within the development. All proposed roads have been designed in accordance with the County’s Consolidated Fire Code requirements. The Evacuation Plan contains an educational component that ensures that residents are educated about the proper evacuation routes. [1-113]</td>
<td>No change</td>
<td>1. Removed all gates except two that will be controlled by a 24/7 gate guard; 2. Added 5th evacuation route (Nelson Way); 3. Added a 3rd lane out on West Lilac Rd; 4. Added a 3rd lane out on Circle R Drive; 5. Will build “roundabout connector” prior to 1st home; 6. Will build “north south connector” prior to Ph 2.</td>
</tr>
<tr>
<td>Evacuation Routes</td>
<td>In addition, an Evacuation Plan was prepared for the project identifies evacuation routes, evacuation points, and specific measures to keep future residents and employees informed about what to do in the event of an emergency. The Evacuation Plan includes both primary and secondary evacuation routes. All proposed evacuation routes have been designed in accordance with the County Fire Code and would comply with minimum horizontal radius, fall within the 20 percent maximum allowable grade, and meet or exceed the minimum paved width requirements. The Evacuation Plan is designed to allow adjustments to the plan. [1-101]</td>
<td>No change</td>
<td>3. Provides evacuation plan for the project.</td>
</tr>
<tr>
<td><strong>STAFF RECOMMENDATION</strong></td>
<td>“Staff recommends that the Planning Commission consider the proposed project, and if they concur with staff's recommendation, recommend to the Board of Supervisors...” [1-114]</td>
<td>“If the Planning Commission determines that the changes are not substantial, then the 2018 Project will be presented to the Board for a decision once the environmental analysis is completed and responses to the public comments have been finalized. The Planning Commission recommendation from 2015 will then be presented to the Board for consideration.” [1-21]</td>
<td>“...County staff has determined the Project is unsafe and is recommending denial of the Project, which will be presented to the Board of Supervisors on June 24, 2020.” [3]</td>
</tr>
</tbody>
</table>
ATTACHMENT 2
WILDFIRE RISK ASSESSMENT
(DICUS)
LILAC HILLS RANCH
WILDFIRE RISK
ASSESSMENT

Christopher A. Dicus, PhD
cdicus@calpoly.edu
Executive Summary

Recent wildfires throughout California have resulted in heightened scrutiny of San Diego County development projects. This white paper will address differences between fire ecology, factors that influence wildland fire behavior, building requirements, fire mitigation and preparedness measures, and other factors that differentiate communities devastated in the recent wildfires in northern California from the proposed Lilac Hills Ranch (“LHR”) community in San Diego County, California.

While both LHR and Paradise reside in a State-designated Very High Fire Hazard Severity Zone, the proposed LHR development will be significantly safer than areas that were recently burned in northern California due to the myriad of mitigation factors being included in LHR. It is these fire safe features within LHR that will even make the existing neighborhoods that currently border LHR safer than they currently are today. For the reasons that follow in this report, LHR will minimize risk to life and property.

First, changes to the fuels in LHR will be safer at multiple scales than in recently destroyed communities in northern California. At the community-level scale, the lands in and around LHR are dissected by irrigated agricultural lands that will impede active fire spread; further, at the boundaries of LHR, an irrigated fuel management zone will extend 100 feet around the community. At the smaller parcel-level scale, defensible space is designed around all structures and will be rigorously enforced and funded by the LHR Home Owners Association (HOA). In contrast, the community of Paradise had contiguous fuels that surrounded the community and lacked any appreciable defensible space around buildings and did not have an HOA to enforce and fund ongoing fuel reduction and defensible space.

Of greatest importance to risk reduction, the buildings in LHR will be built to stringent building codes that require ignition-resistant construction of vulnerable components, including standards for roofing, siding, windows, vents, decks, and others. In contrast, because Paradise was largely comprised of fire-prone buildings that were constructed 40 or more years before wildfires were considered in building codes, homes in Paradise easily ignited via burning embers and subsequent house-to-house spread (even though the trees on many burned properties were largely unscathed).

LHR is also designed to maximize efficiency of fire suppression efforts. LHR has proposed a new fully-staffed 24/7 fire station with a type 1 fire engine, which in combination with the existing CAL FIRE station at the northern border of the community will enable a 5-minute response time throughout the community. Further, an improved public water supply system including placement of fire hydrants throughout the community at strategic locations exceeds current fire code standards.

LHR residents (and the surrounding community) will also benefit from a previously tested fire notification system, which has been employed with great success during other large fires in San
Diego County. Further, changes to the road infrastructure in and around the community will enable rapid and orderly evacuation of its residents in conjunction with nearby existing neighborhoods that abut the LHR development (e.g., LHR will contribute to, and/or make improvements to 39 different local road segments and intersections outside the community), which will improve road safety and traffic flow. As an alternative contingency, the community will also be designed so as to enable a passive shelter-in-place approach for residents and neighbors should evacuation be phased, halted or precluded entirely. Contrast that with Paradise, where authorities were unprepared to evacuate the entire town simultaneously, leading to confusion on when residents were to leave, long traffic delays in perilous conditions, and subsequent multiple fatalities during evacuation.

After visits to the proposed LHR development and review of its fire safety characteristics, it is my determination that the LHR development would provide a safe area for its residents that would simultaneously benefit nearby neighborhoods with reduced fire risk via improved evacuation routes and contingency refuge areas, increased fire response and emergency facilities, and a significant investment in fire safety education, prevention and protection.

Additionally, LHR is not like Paradise or other communities that were built before current fire standards. The LHR project includes a multi-layered fire protection system that is based on ignition resistant buildings and landscapes, adherence to stringent codes, fire-fighting water availability, swift emergency response, and a sound evacuation planning that includes a contingency option for residents who may be directed to temporarily shelter within the community during a wildfire evacuation. LHR, like other new, master-planned communities, should not be compared with older, less restrictive communities that were not built to the latest codes and ongoing maintenance. Other new, nearby communities have performed extremely well during wildfires and given the LHR’s location, surrounding fire environment, and proposed fire protection plans, it is anticipated that the project will represent lowered risk to both LHR residents and nearby neighboring communities.
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1. Introduction

As a result of recent wildfires in northern California, there has been heightened scrutiny of development of new communities in San Diego County, specifically those proposed in wildland-urban interface (WUI) areas that have the potential for the built environment to be exposed to wildfire. This white paper will address differences between fire ecology, factors that influence wildland fire behavior, building requirements, fire mitigation and preparedness measures, and other factors that differentiate communities devastated in the recent wildfires in northern California from the proposed LHR community in San Diego County.

The proposed Lilac Hills Ranch (LHR) development is a compact mixed-use village on 608 acres located less than one mile from the I-15 transportation corridor in the northern unincorporated County of San Diego, California. The LHR community will consist of 1,746 homes, including 903 single-family dwellings, 468 age-qualified homes, 211 mixed-use homes, and 164 townhomes. This document investigates potential wildfire risk on LHR and offers further potential measures that could be implemented over and above the already high level of fire-safe design.

2. Fire Ecology

The vegetation, ecology, and general landscapes in and around Paradise are very different than in San Diego County. In general, areas in northern California affected by wildfire have historically consisted of open, park-like stands of mature, mixed-conifer forests, which were maintained by frequent, low-intensity surface fires that significantly reduced vegetative fuel loading and continuity. Northern San Diego County, however, has historically consisted of coastal sage scrub and chaparral characterized by less frequent, but more intense wildfires than those found in northern California.

The native landscapes in both regions, however, have significantly changed over time from their historic conditions, which has drastically influenced the likely types of fires that could occur in both locales. For example, fire exclusion (largely via fire suppression activities) has caused the mixed-conifer forests in northern California to miss many successive intervals of normally low-intensity fire. In the absence of these small, mostly benign surface fires, the vegetation grew and greatly increased surface fuel loading and continuity, traits that foster high-intensity crown fires.

The landscape around LHR has also changed, but potential fire intensity has seemingly decreased due to clearing of the native shrublands to facilitate agricultural operations. While an increasing population in the region certainly increases the potential for man-made ignitions, the landscape no longer consists of large, contiguous, fire-prone shrublands. While these agricultural lands do have the potential to burn (especially under hot and dry Santa Ana wind conditions), the irrigated,
sparse landscape around the proposed LHR development would retard the spread and intensity of wildfires in and around the community.

The greatest change to fuels in both locales is due to the building of homes and other structures in the landscape. As will be discussed, the homes in Paradise were built before building codes were adopted to make homes resistant to ignition during a wildfire. In comparison, homes in LHR will be built to meet (and in some cases exceed) stringent County of San Diego Consolidated Fire Code that have been specifically enacted to resist ignition during a wildfire, including County Building Code (Title 9, Division 2, Chapter 1 of the San Diego County Code of Regulatory Ordinances) and Chapter 7A of the California Building Code. While older buildings in Paradise exacerbated an ecosystem that was well outside its historically normal range of fire size and intensity, the ignition-resistant buildings in LHR should be expected to actually impede spread of wildfire in a landscape that has already converted in many parts to low-hazard agriculture practices.

3. Fire Hazard

Fire hazard is a factor of the probability of a wildfire occurring in a given area and its likely fire behavior (i.e., fire intensity, ember cast, etc.) as it moves across a given landscape. The State has created Fire Hazard Severity Zones, which as will be shown does not necessarily convey the potential for structural loss. Fuels, weather, and topography (the primary factors that drive wildland fire behavior) vary greatly between LHR and the communities in northern California that were recently impacted from wildfires and each of these factors will be discussed in turn.

Fire Hazard Severity Zones

CAL FIRE designates all areas in which it has primary fire protection responsibilities into one of three Fire Hazard Severity Zone (FHSZ) designations, including (1) Moderate, (2) High, and (3) Very High. Local jurisdictions can also choose (or choose not) to adopt a State-recommended Very High FHSZ designation for its local area. The State bases these designations on likely fire behavior to be experienced in a given area (a factor of extreme weather conditions, mature vegetation, and slope steepness) and the probability of fire occurrence (a factor of previous fire history in the area).

Both LHR and Paradise are located in areas that the State has designated as a Very High FHSZ (Figures 1-2), but this identical designation does NOT convey the same risk potential between the sites. By design, the State purposefully looks to the likely mature (and untreated) vegetation of a given area because it assumes a worst-case posture in which the landscape is never treated to mitigate potential fire behavior. Indeed, mitigation activities have no bearing on the designated FHSZ classification for a given area.
To put this into perspective, an estimated 70% of San Diego County falls within a “High” to “Very High” Fire Severity Zone (Figure 1) due to the County residing in a Mediterranean climate, having a patchwork of combustible fuels in steep terrain, and the potential for dry Santa Ana winds throughout the year. While fire hazard assessment is an important consideration for development projects within the wildland urban interface, the State-designated zones are not created to restrict development.
Although LHR is located in a Very High FHSZ, it will have a significantly lower potential of actual loss than other older communities (such as Paradise) that are also located in a Very High FHSZ. This is based upon the distinction between HAZARD (which the State categorizes) and RISK (which the state does not quantify).

HAZARD is the potential fire behavior (i.e., flame length, crown fire occurrence, capacity to generate embers) in the predicted mature vegetation of the area. RISK, however, is the potential for structural loss from said fire. Thus, even if there is a potential low fire hazard in a given area
(expected low flame lengths), a home might still be at high risk of ignition if the physical characteristics of the property would facilitate structural ignition (e.g., flammable vegetation next to a home with wood siding).

Conversely (and more applicable to LHR), a home might be in a high-hazard area (potential exposure to high flame lengths and ember generation), but may actually be at low risk of ignition if the house is built with ignition-resistant construction materials and adequate defensible space is provided around the home.

This is especially true in planned communities where fuel modification can be provided over large areas and includes a perimeter fuel modification zone. Recent research\(^1\) indicates that scenarios with lower housing density, large lots (ranchettes) and larger numbers of small, isolated clusters of development resulted in higher predicted fire risk. By way of comparison to the low-density General Plan land use patterns, the proposed LHR land use density would not only be safer for the residents within LHR, but the LHR community itself would act as a large irrigated fire break that would be expected to impede fire spread by inhibiting large-scale wildland fires from spreading across the project site.

**Fuels**

The fuel types and loadings vary significantly between LHR and the areas devastated by wildfire in northern California, which is readily apparent at multiple scales. At the largest landscape-scale, native vegetation in and around LHR consists of fire-prone shrubs, which could potentially burn with high intensity. However, unlike Paradise, continuity of these fuels is broken up by irrigated agricultural fields and orchards (Figure 3). While these agricultural operations can potentially ignite during a wildfire, especially under Santa Ana wind conditions, they burn with much lower intensity and rates of spread than in continuous native vegetation, thereby buffering the community from a uniform fire front.

As a condition of approval, the project is expected to be required to provide a 100-foot fuel modification zone/limited building zone (FMZ) for each proposed building, which will be consistent with Section 4907.2 of the 2017 County of San Diego Consolidated Fire Code, which will further reduce potential exposure of the community to flames and radiant/convective heat. The outer 50 ft portion of the FMZ will consist of a thinned zone that removes the highest flammability fuels and then thins remaining vegetation to a minimum 50% ground cover. The inner 50 ft of the FMZ (nearest the community) calls for complete removal of existing vegetation and replanting with ignition-resistant species at low densities. If there are any deviations from the FMZ being less than 100 ft, additional mitigations must be employed, including for example, a heat-deflecting wall, extended irrigated zones, and/or upgraded hardening of given residences. Per the LHR Fire Protection Plan, there are only a few areas where creating a new 100 ft FMZ is

considered necessary due to the presence of off-site land uses (e.g., orchards) that mimic the features of an FMZ.

A few small areas of contiguous native vegetation will exist within the boundaries of LHR, but are largely confined to riparian areas, which generally burn with lower intensity; as one proceeds out of the riparian area of some canyons, vegetation converts to native shrublands. In the small portions of the development where homes are to be built above these types of canyons, significant reduction of fuels will be provided via the described FMZs and ongoing agriculture operations.

In contrast, unlike LHR and surrounding areas, the landscape-level vegetation in and around the Paradise area (Figure 4), consisted primarily of (1) mature mixed-conifer forests with a high degree of both horizontal and vertical continuity, and (2) high loads of contiguous grasses in areas that were burned a decade ago. These fuel types facilitated rapid fire spread and intensity in the wildland areas that surrounded Paradise, and also caused an enormous storm of embers to be cast onto individual parcels. While some of the surrounding areas near Paradise were burned in a fire in 2008, the high grass levels (fostered by late spring rains) was continuous and facilitated rapid spread into the community.

Figure 3. Land use surrounding proposed Lilac Hills Ranch development are segmented across the landscape with agricultural conversion of native landscapes resulting in lower fuel densities.
LHR will be required by the Deer Springs Fire Protection District (DSFPD) to provide ignition-resistant landscaping around homes and other buildings, along roads, and in the FMZ that surrounds the community. Landscaping plants on individual parcels must adhere to the County of San Diego Acceptable Plants for Defensible Space in Fire Prone Areas, with some fire-prone species being explicitly precluded, including fire-prone California sagebrush (*Artemesia californica*), flat-topped buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), and palms (*Palmae* sp.). This ignition-resistant landscaping will be strictly managed via a funded HOA, (via HOA fees) and enforced by the DSFPD. The DSFPD will also enforce regulations related to the placement of ornamental vegetation, which will significantly reduce radiant heat and direct flame exposure to the structures in LHR.

Although Paradise had nearly identical defensible space regulations as LHR (minus restricted plants), local authorities there did not seem to regularly enforce these regulations (Figure 5), which is unfortunately common in areas that do not have a funded HOA and in areas where the fire agency does not have the capacity to enforce defensible space regulations. The high degree of near-structure vegetation in Paradise, which was prevalent throughout the community before the 2018 Camp Fire, would have readily ignited the adjacent structures once they started burning.

All that said, the most granular level of fuels to consider (the homes themselves) served as the most important fuel that led to the mass devastation in Paradise. Indeed, throughout that community, home after home was destroyed, but the adjacent vegetation was left largely untouched (Figure 6). I have personally witnessed this phenomenon in multiple large, destructive
fires, including the 2007 Witch Creek Fire in San Diego County, the 2009 Black Saturday Fires in Victoria, Australia, the 2017 Tubbs Fire in Santa Rosa, and the 2018 Woolsey Fire in Los Angeles County. In all cases, mass destruction in many parts of the fire boundary was largely related to homes igniting via an ember storm, which burned many homes from the inside out following embers entering the structure via vents, windows, under doors, etc.

Figure 5. Lack of defensible space in Paradise, which was typical throughout the community.
Structures in LHR have been designed to prevent ember intrusion through application of the latest building codes. In the most simplistic perspective possible, if a home does not ignite, it will not burn. To combat structural ignition, the State and County of San Diego have enacted stringent building codes to resist ignition during a wildfire, including County Building Code (Title 9, Division 2, Chapter 1 of the San Diego County Code of Regulatory Ordinances) and Chapter 7A of the California Building Code. These standards address structural features susceptible to ignition, including:

1. Roofs
2. Exterior walls
3. Vents
4. Eaves
5. Projections such as decks, exterior balconies, etc.
6. Windows and other transparent openings such as a sun roof
7. Fences within 5-ft of the structure
8. Rain gutters
9. Exterior doors
10. Window screening
11. Setbacks of structures from slopes

All homes in LHR will adhere to the stringent County Building Codes, thus restricting structural features that are susceptible to ignition. The vast majority of homes in Paradise, however, were built before 1970, almost 40 years before California enacted building codes to resist ignition during a wildfire. A non-technical observation from one UC researcher indicated that the very few homes left standing in Paradise were of newer construction, built to the new ignition-
resistant building standards that resist both radiant heat and (perhaps more importantly) exposure to embers\(^2\).

It should be noted that burning homes also serve as a catalyst to ignite other nearby structures due to their enormous heat output coupled with long periods of active burning that can last for hours (which differs greatly from vegetation fires in which the threshold radiant heat energy needed to ignite a building generally only lasts 5-10 minutes before the vegetative fine fuels are consumed and the fire spreads elsewhere). Indeed, a large percentage of homes in both Paradise and Santa Rosa apparently burned via house-to-house spread. This was particularly acute in Santa Rosa where 1,300+ homes burned in the Coffey Park development, even though virtually no one considered the area to be at risk to wildfire.

Specific to San Diego County, one study\(^3\) found that the three greatest factors determining home survival in Ramona and Rancho Santa Fe during the 2007 Witch Creek Fire were age of construction (which influences the potential for ignition-resistant building materials), presence of vegetation within 5’ of a given building (which influences potential for flame impingement on the structure), and distance from native vegetation (which influences the potential amount of ember exposure). Pertinent to LHR, the study demonstrated that development of ignition-resistant homes with proper defensible space can actually reduce the potential loss of older, interior homes because they begin to shelter the older, ignition-prone homes from exposure to flames, heat, and embers.

**Climate/Weather**

While climate (particularly annual precipitation) varies significantly between LHR and Paradise (leading to differing types of vegetative fuels and fuel loading), similar types of hot, dry winds should be expected in both locales during late fall, which readily leads to elevated fire hazard. What exacerbated the destruction in the 2017 fires in Santa Rosa and the 2018 fire in Paradise was the absence of precipitation that would normally precede the fall winds and subsequently greatly reduce the potential for active fire spread. Some believe that the delay in precipitation that northern California has experienced may be related to long-term climate change, which is anticipated to have greater effects in northern California than in southern California.

Climate in LHR is Mediterranean and is located in the County’s Transitional climatic zone. The majority of the 11.4 inches of average annual precipitation falls during the mild winter months. Periods of up to 7 months without precipitation regularly occur and generally last until November. This low rainfall and periods of annual drought limit the production of vegetative fuels (which is largely drought-tolerant shrubs), but also serves to significantly reduce moisture content to critically low levels, subsequently making the plants more conducive to active

\(^2\) Y. Valachovic, University of California Cooperative Extension. What can we learn from the 14,000 homes lost during the Camp Fire? <https://ucanr.edu/blogs/blogcore/postdetail.cfm?postnum=29026>

\(^3\) Morais, N.C., C.A. Dicus, and D. Sapsis. *In review*. Changing fire risk over time across three communities in southern California.
combustion. As noted, however, native shrubs in and immediately around the community are commonly noncontiguous due to the presence of ongoing irrigated agricultural operations.

Due to higher rainfall levels where the recent northern California fires occurred (e.g., Paradise receives >58 inches of annual precipitation), vegetative production and subsequent vegetative fuel loads were much higher there than would be found in San Diego County. Further, late spring rains in 2018 caused elevated grass loads, which when cured, served to quickly bring the wildfire into the community of Paradise.

The highest period of fire hazard in San Diego County occurs during Santa Ana wind conditions, which usually occurs in late fall after the region’s normal period of annual drought, but may occur in other parts of the year. These winds, estimated in San Diego County to have sustained wind speeds of ~30 mph (with gusts exceeding 40 mph) and critically low relative humidity levels of 5%-9% (which dries vegetation and makes it easier to ignite), can facilitate intense and rapidly moving wildfires. Indeed, the vast majority of the most destructive fires in San Diego County (including the Cedar Fire, Witch Creek Fire, Harris Fire and others) occurred during Santa Ana wind conditions. It should be noted again, however, that the irrigated agriculture throughout the LHR vicinity and the ignition resistant landscapes of LHR would mitigate fire spread and intensity in and around the development. Further, the proposed community fire protection features in LHR were specifically designed based on “worst-case” weather conditions.

The recent destructive fires in Paradise and Santa Rosa also occurred under wind conditions similar in nature to Santa Ana winds. The winds that drove the wildfire into Paradise were especially strong because they were directionally aligned with steep canyons that bounded the western and eastern edges of the community; these canyons then served to funnel and accelerate the winds before they entered the town.

**Topography**

The topography in LHR also significantly varies from that in Paradise. Elevations in LHR range from 590 ft to 960 ft and occur in generally rolling hills, which sometimes includes small canyons that contain native fuels that are directionally aligned with the normal direction of Santa Ana winds. While this should be of some concern, dead and dying vegetation will be removed in these areas and these sites will be maintained to reduce ladder fuels. Further, as previously noted, most of the small canyons consist of riparian vegetation, which while certainly capable of burning, is generally moister and therefore less conducive to high intensity fires that would threaten any homes above them.

While the community of Paradise is relatively flat, this can be deceiving because it is bounded by steep canyons that range from 2000 ft to 2800 ft below the ridgetop in which it resides. As noted, these extremely deep, sheer canyons were directionally aligned with the strong winds, slamming the homes at the edge of the slopes and causing an ember storm that fell far within the community (subsequently facilitating house-to-house spread).
**Previous fire history**

LHR resides in a region that has experienced many large wildfires, particularly in the last 20 years due to increased population that subsequently leads to more human-induced ignitions (Figure 7). Local fire authorities are extremely adept at suppressing ignitions under average weather conditions, suppressing the vast majority of wildfires during initial attack operations. It is during extreme weather events (normally induced by Santa Ana wind conditions) that homes are most likely to burn.

San Diego County learned some hard lessons during the destructive 2003 fire season, which burned over 5,000 structures. In those fires, homes that were built under 2001 building codes survived at a rate three times greater than homes built before the codes were strengthened. Following the 2003 fires, the County has enacted a series of even more restrictive building codes meant to protect a home during a wildfire.

The County is at the cutting edge of fire protection, a position that it was forced to pursue following devastating wildfires in 2003 (Cedar Fire) and 2007 (Witch Creek Fire), along with other smaller, yet important wildfires. Following the Cedar Fire, the County began a multi-pronged approach to fire protection that included significant investments in firefighting resources (air attack, apparatus, staffing, facilities, emergency alert system, and pre-planning), but equally as important, the County conducted post-fire save and loss assessments. These assessments were vital to understanding the factors leading to home survivability.

Additionally, the County created a comprehensive fire protection planning approach that requires each project to be evaluated by a qualified fire protection planner/firm, to document the project’s code compliance, to disclose if any condition is not code compliant, and provide appropriate mitigations that meet the intent of the code. The County has spent in excess of $100 million toward fire suppression, fuel reduction, planning, and emergency response, and has had multiple, successfully managed wildfire events to engage the pre-plans, learn from the process, and adjust practices. Although the wildfire threat remains, particularly where old homes abut natural vegetation, the County is far safer today than it was 20 years ago because newer structures and planned communities (built to the latest codes) are designed to resist ignition, even during significant wildfire threats.

Major fires in San Diego County since 2003 are listed in Table 1. These fires, all of which were human-caused, generally coincided with normal Santa Ana wind conditions, which subsequently led to heavy structural losses. However, it should be noted that the degree of devastation in any of those given fires was not uniform, but instead varied community-to-community based upon the age of the homes, the home construction standards in the development, and the degree of defensible space employed in a given community. For example, the 2007 Witch Creek Fire burned 501 (mostly older) homes in Ramona, but left newer developments in Rancho Santa Fe that were specifically designed to reduce fire risk completely unscathed.

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4 County of San Diego, Planning & Development Services, Wildland-Urban Interface Building Division
<https://www.sandiegocounty.gov/pds/docs/pds664.pdf>
Table 1. List of recent, devastating wildfires in San Diego County.

<table>
<thead>
<tr>
<th>Fire</th>
<th>Date</th>
<th>Acres Burned</th>
<th>Structures Destroyed</th>
<th>Structures Damaged</th>
<th>Deaths</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cedar Fire</td>
<td>October 2003</td>
<td>280,278</td>
<td>5,171</td>
<td>63</td>
<td>14</td>
</tr>
<tr>
<td>Paradise Fire</td>
<td>October 2003</td>
<td>57,000</td>
<td>415</td>
<td>15</td>
<td>2</td>
</tr>
<tr>
<td>Otay Fire</td>
<td>October 2003</td>
<td>46,291</td>
<td>6</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Witch Creek Fire</td>
<td>October 2007</td>
<td>197,990</td>
<td>1,125</td>
<td>77</td>
<td>2</td>
</tr>
<tr>
<td>Harris Fire</td>
<td>October 2007</td>
<td>90,440</td>
<td>255</td>
<td>12</td>
<td>5</td>
</tr>
<tr>
<td>Poomacha Fire</td>
<td>October 2007</td>
<td>49,410</td>
<td>139</td>
<td>Not Available</td>
<td>0</td>
</tr>
<tr>
<td>Rice Fire</td>
<td>October 2007</td>
<td>9,472</td>
<td>208</td>
<td>Not Available</td>
<td>0</td>
</tr>
<tr>
<td>Bernardo, Poinsettia &amp; Cocos Fires</td>
<td>May 2014</td>
<td>26,000</td>
<td>65</td>
<td>19</td>
<td>0</td>
</tr>
<tr>
<td>Lilac Fire</td>
<td>December 2017</td>
<td>4,100</td>
<td>157</td>
<td>64</td>
<td>0</td>
</tr>
</tbody>
</table>

Figure 7. Fire history of San Diego County.
Other developments in southern California that have been designed to resist wildfires have shown similar rates of significantly lowered loss when exposed to wildfire, including the 4S Ranch in San Diego County, Stevenson’s Ranch in Santa Clarita, Serrano Heights in Orange County, and others. All of these communities were built with heightened requirements for fire safety, including hardened buildings, protected roofs, vent protections, maintained fuel modification zones, and others, all of which will be employed by LHR.

In contrast to San Diego County, wildfires have also occurred in and around Paradise and Santa Rosa (sometimes reburning the exact same areas), but little was done to reduce risk of structural loss there. Indeed, the 2017 Tubbs Fire followed in almost exact same footprint as the 1964 Hanley Fire; what differed from 1964 and 2017 was the amount of fire-prone homes that were built in the area. Had these homes been built with fire-resistant materials such as required by Chapter 7A of the California Fire Code, it is highly unlikely that the level of devastation would have been the same. Similarly, 13 significant wildfires occurred in the last 20 years around the community of Paradise, yet there seemed to be little mitigation to reduce the risk there; when the 2018 Camp fire ignited under extreme weather conditions, a massive ember storm easily ignited older homes, which then caused a chain reaction of structure-to-structure ignitions.

While San Diego County has been incredibly progressive in their attempts to reduce wildfire losses (especially following the 2003 fire siege), the sites recently impacted in northern California did not seem to take their fire risk as seriously. For example, CAL FIRE reportedly warned Paradise as early as 2005 that the community was at risk of a devastating conflagration similar to that experienced in the 1991 Oakland Hills Fire, which killed 25 and destroyed 2,900 structures. Butte County FireSafe Council had been awarded over $600k in grant funding for fuels reduction in Paradise, but did not have time to utilize these funds before the fire burned through the community; that said, given the nature of ember-driven ignitions and subsequent house-to-house spread (with little impact to the adjacent forest), it is unclear if the fuel reduction would have had any significant impacts to the level of destruction experienced during the Camp Fire. It is possible that utilizing these funds along with homeowner funds to retrofit older homes for ember resistance and structure hardening would have been more impactful.

**Potential ignition sources**

Wildfires in areas near LHR, and throughout San Diego County and California, are almost always human-induced. Efforts to reduce risk of ignition within LHR include undergrounding powerlines, which would effectively eliminate a potential ignition source. Further, roadside clearance is planned within the community, which will reduce the risk of wildfire ignition from vehicles (via glowing catalytic converter debris, sparks from dragging chains, etc.).

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Many of the destructive fires in the region (and also the recent devastating fires in Santa Rosa and Paradise) were ignited by powerlines. Of note, however, San Diego Gas & Electric has recently taken a very aggressive approach at restricting ignitions via their powerlines, becoming one of the most progressive utilities in the world at closely monitoring conditions that might facilitate ignitions and rapid fire spread, and then taking appropriate steps to minimize fire starts, including shutting down the electrical grid in areas deemed to be potentially vulnerable to ignition. Further, the California Public Utilities Commission, as of February 6, 2019, now requires all energy companies in California to prepare comprehensive Wildfire Mitigation Plans. These plans are detailed assessments and accountings of the risk drivers and the risk reduction measures that are being employed for each facility, including electrical transmission and distribution lines.

4. **Mitigation in Lilac Hills Ranch**

Certainly not all fires can be avoided and residents throughout Unincorporated San Diego County should therefore be prepared for wildfire. As noted previously, however, a potentially high fire hazard does not equate to high risk of structural loss if varying types of mitigation practices are employed to reduce said risk. This section explores various activities LHR will employ to improve safety and reduce risk to life and property of its residents.

**Wildland fuels**

Due to the normal easterly direction of Santa Ana winds (which causes the greatest potential for fire losses), areas of greatest concern to the community are on the northern and eastern portions of the development. Fortunately, much of the adjacent properties are agricultural in nature and buffer the community from an oncoming fire even under Santa Ana wind conditions. Further, an irrigated buffer will extend around the community to limit exposure of flames and radiant heat to the community.

Within the development, approximately 75% of the land is within areas that have been transformed into agricultural uses, thereby reducing potential for fire spread through the community. Existing vegetative fuels are largely relegated to riparian areas in the canyon bottoms and coastal sage scrub on slopes in the western edge of the development (the location of which would limit exposure of the development to high-intensity, wind-driven fires). To mitigate potential hazard caused by native vegetation, the Fire Protection Plan calls for certain actions in these open space areas, including:

- Eliminating flammable non-native species (peppers, eucalyptus, palms, etc.)
- Removal of dead and dying vegetation in riparian canyons
- Creation of fuel management zones in areas adjacent to structures

**Landscaping fuels**

Unlike in Paradise and Santa Rosa, where enforcement of existing defensible space regulations seemed minimal, defensible space will be created and strictly enforced per the Project’s fire
protection plan and per San Diego County Consolidated Fire Code Section 96.1.4907.2. This plan calls for zones of vegetative management around every single structure, and the project perimeter, including:

- 50’ from structure (low fuel volume/defensible space zone): all non-fire-resistant plants to be removed and replaced with irrigated fire-resistant vegetation
- 50’-100’ from structure (selectively thinned zone: removal of all dead and dying material with a maximum of 50% of the area consisting of native vegetation. These areas may include the agricultural lands in the development.

**Construction materials**
As noted previously, the homes themselves should be considered the most important fuel in which to manage. To that end, all structures in LHR will be built with fire-resistant construction materials and assembly methods that adhere to the stringent County Building Code (Title 9, Division 2, Chapter 1 of the San Diego County Code of Regulatory Ordinances), which protects the portions of a structure most vulnerable to ignition via radiant heat and ember cast, including:

- Roofs
- Exterior walls
- Vents
- Eaves
- Projections such as decks, exterior balconies, etc.
- Windows and other transparent openings such sun roofs
- Fences within 5’ of the structure
- Rain gutters
- Exterior doors
- Window screening
- Setbacks of structures from slopes

Of special significance, all buildings in LHR will be fitted with interior sprinklers, which have been shown to be extremely effective at quickly extinguishing fires if they ignite via embers in the interior of the structure.

These and other standards in LHR will greatly curtail the potential risk of structural ignition and subsequent house-to-house spread during a wildfire, thus avoiding the type of conflagration experienced in Paradise and other older communities that were built well before current building standards were enacted.

**5. Emergency Response Preparedness**
In addition to mitigating potential home losses, a given community must prepare for the actual event, including having means for local fire agencies to quickly and adequately respond to a fire
event and for residents to be able to either evacuate the area or be able to safely survive the fire event within the development if unable to leave the area due to unforeseen circumstances.

**Suppression capabilities**
The Deer Springs Fire Protection District is the Fire Authority Having Jurisdiction for the development and has contracted with CAL FIRE to provide fire protection services for the District. As proposed, LHR will essentially have three fire stations within 10-minutes of the community, including a new District fire station in the middle of the development, a District fire station to the south located on Circle R Drive, and a CAL FIRE station on its northern boundary (Miller Fire Station; Figure 8). If the project co-locates a new District Station within the Miller Fire Station site, there would be 2 Fire Stations within 5 minutes or less of all the homes. Further, there are 2 other stations in the Deer Springs Fire District (which serve an estimated populace of 13,000 current residents) and there are automatic aid agreements in place from other nearby fire districts that will respond if there is need.

![Figure 8. Location of fire stations in vicinity of Lilac Hills Ranch. Existing CAL FIRE station (on northern boundary) and new DSFPD station will allow response to every home in development within 5 minutes.](image)

**Water supply**
The LHR community will have several sources of water supply for fire response capabilities, providing for supply requirements to meet the standards in the San Diego County’s Consolidated Fire Code and the Fire Code for a commercial/business/residential development. Fire hydrants will be installed at all road intersections, the beginning radius of cul-de-sacs and within 300’ of every structure in the development. The water supply will capable of providing 2500 gallons/minute for 2 hours.
**Road infrastructure**

Road infrastructure to facilitate simultaneous ingress of firefighting equipment and egress of residents will be significantly better in the newly developed LHR than in the Paradise area. Proposed changes to existing road infrastructure will provide safety benefits to both LHR residents and to neighboring residents. For example, LHR will make improvements to 39 different local road segments and intersections outside of the community that will greatly enhance circulation, connectivity, mobility, evacuation capability, and ultimately public safety (Figure 9, Table 2). In addition, LHR presents a temporary safe refuge for existing residents to the east (a total of approximately 65 residences) that would have at least two routes to reach LHR and its designated temporary refuge facilities (Figure 10).

Per the extensive LHR Evacuation Plan, ingress/egress from the project will include primary and secondary evacuation routes. Unlike the road network developed long ago in Paradise, these roads will be built to current San Diego County Public and Private Road Standards and will be in compliance with County of San Diego’s Consolidated Fire Code, which calls for specific standards for:

- Road width
- Grade
- Maximum distance of driveways

Further, roadside clearance of vegetation will be established and maintained, which will greatly improve conditions for any area residents that attempt to leave the development during the fire event.
Figure 9. Planned road improvements to improve public safety near Lilac Hills Ranch.

Table 2. List of improved road segments and intersections planned near Lilac Hills Ranch.

<table>
<thead>
<tr>
<th>SEGMENTS</th>
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<tbody>
<tr>
<td>1. Camino Del Rey, Old River Road to W. Lilac Road</td>
</tr>
<tr>
<td>2. W. Lilac Road, Old Highway 395 to Main Street</td>
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<tr>
<td>3. W. Lilac Road, Main Street to Street “F”</td>
</tr>
<tr>
<td>4. Old Highway 395, SR-76 to E. Dulin Road</td>
</tr>
<tr>
<td>5. Old Highway 395, E. Dulin Road to W. Lilac Road</td>
</tr>
<tr>
<td>6. Old Highway 395, W. Lilac Road to I-15 SB Ramps</td>
</tr>
<tr>
<td>7. Gopher Canyon Road, E. Vista Way to Little Gopher Canyon Road</td>
</tr>
<tr>
<td>8. Gopher Canyon Road, Little Canyon Road to I-15 SB Ramps</td>
</tr>
<tr>
<td>9. E. Vista Way, SR-76 to Gopher Canyon Road</td>
</tr>
<tr>
<td>10. E. Vista Way, Gopher Canyon Road to Osborne Street</td>
</tr>
</tbody>
</table>
11. Lilac Road, Old Castle Road to Anthony Road  
12. Cole Grade Road, Fruitvale Road and Valley Center Road  
13. Valley Center Road: Cole Grade Road to Vesper Road  
14. Camino del Rey: SR 76 to Old River Road  
15. Old Castle Road: Old Highway 395 to Old Lilac Road  
16. Lilac Road: Anthony Road to Betsworth Road  
17. Lilac Road: Betsworth Road to Valley Center Road  
18. Valley Center Road: Woods Valley Road to Lilac Road  
19. Valley Center Road: Lilac Road to Miller Road  
20. Valley Center Road: Miller Road to Cole Grade Road  
21. Old Highway 395: Circle R Road to Gopher Canyon Road  
22. West Lilac Clear Space Easement  
23. Circle R Clear Space Easement  

**INTERSECTIONS**  
24. E. Vista Way / Gopher Canyon Road  
25. Old Highway 395 / E. Dulin Road  
26. Old Highway 395 / W. Lilac Road  
27. I-15 SB Ramps / Old Highway 395  
28. I-15 NB Ramps / Old Highway 395  
29. Old Highway 395 / Circle R Drive  
30. I-15 SB Ramps / Gopher Canyon Road  
31. I-15 NB Ramps / Gopher Canyon Road  
32. Miller Road / Valley Center Road  
33. SR 76 / Old River Road / E. Vista Way  
34. Old River Road / Camino Del Rey  
35. W. Lilac Road / Camino Del Rey  
36. Old Highway 395 / Camino Del Rey  
37. Lilac Road / Old Castle Road  
38. Valley Center Road / Lilac Road  
39. Cole Grade Road / Valley Center Road
Figure 10. Temporary safe refuge areas within Lilac Hills Ranch.

Public notification
Public notification to LHR residents of a fire’s approach is currently via a reverse-911 system, administered by the San Diego County Sheriff’s Office, which provides a 15-second recorded message via landlines and cell phones. Further, the Office of Emergency Services operates the “Alert San Diego”, which has the capacity to push out emergency notices to both land lines and cell phones. In both instances, residents must “opt-in” the program by registering individual phones.

In both the 2017 Tubbs Fire in Santa Rosa and the 2018 Camp Fire in Paradise, residential notification was largely lacking. This was due to a myriad of factors including fires quickly burning down cell towers, residents cancelling their landline services, timing of fire spread at night when many residents turn off their phones to facilitate sleep, lack of phone registration via residents not understanding the need to “opt in”, visitors who were unaware of the service, and others.

Because fires may ignite at any time of the day and may move rapidly under Santa Ana wind conditions, LHR will provide ongoing fire awareness training and resources to its residents. The goal is to create a fire-aware community that understands the types of fire threats that may occur and what actions law enforcement or other officials may direct them to take.

While the 2003 Cedar Fire taught San Diego valuable lessons about fire preparedness and created an invaluable reverse-911 service to provide emergency notifications to the community, there were still large problems that were not realized until the 2007 Witch Creek Fire. During that fire, the result of the enhanced communication network and reverse-911 system led to the largest evacuation in state history. The County learned from that experience that the reverse-911 emergency system worked almost too well and caused significant
evacuation traffic on the existing road ways, creating a potentially dangerous situation for evacuees that were stuck on congested roads.

Evacuation protocols and strategies have changed since 2007 and the County Sheriff’s Department no longer orders mass evacuations, but is more precise and coordinated, as explained by the County Sheriff representatives and CAL FIRE representatives at a number of Board of Supervisors land use hearings in 2018. The use of technology, experience and situational awareness combine to provide a picture of the threat, its projected movement, and the communities that may be threatened. This information informs evacuation procedures and precisely targeted evacuation declarations are now made to pinpoint areas at highest threat for evacuation, followed by the next highest threat area, and so on.

While this methodology may seem similar to Paradise’s phased evacuation strategy, emergency workers there did not plan for extreme wind events, which is a common factor in large wildfires in San Diego County. Unquestionably, this precision targeting technique was employed with great success in the recent rapidly-moving Lilac Fire.

**Evacuation planning**

The evacuation plan for LHR is extensive (including multiple egress points and evacuation routes; Figure 11) and to a higher standard than that in Paradise. Indeed, previous wildfires in San Diego County that caused large-scale evacuations has led to many “lessons learned” over the years, which have prepared first responders for significant fire events. Whereas Paradise planned for a smaller fire event during average weather conditions (which would enable a phased evacuation), LHR recognizes that local fires will likely burn under Santa Ana wind conditions and has planned accordingly.
San Diego County has successfully implemented phased evacuations using its advanced situational awareness tools and notification technology. While it is possible that a fire could ignite close to the LHR site with less time available to evacuate residents than the time needed for the fire to encroach upon the perimeter FMZ, the fire intensity and built-in protections at LHR provides emergency responders with the contingency option of ceasing evacuations and directing residents to temporarily shelter in their homes or other temporary safe refuge areas within the development. The objective of the ongoing training and fire awareness programs at LHR is to give residents understanding of the capabilities of their homes and the community.

LHR, the DSFPD and the County all incorporate the “Ready, Set, Go!” evacuation protocol. Part of this protocol is understanding when fire threat is at its peak. Red Flag Warnings declared by the National Weather Service provide emergency responders and residents with a warning that they should be prepared to take action if a wildfire develops. The focus of the “Ready, Set, Go!” program is on public awareness and preparedness, especially for those living in the wildland-urban interface. The program is designed to incorporate the local fire protection agency as part of the training and education process in order to ensure that evacuation preparedness information is disseminated to those subject to the potential impact from a wildfire. There are three components to the program:
“READY” – Preparing for the Fire Threat: Take personal responsibility and prepare long before the threat of a wildfire so you and your home are ready when a wildfire occurs. Create defensible space by clearing brush away from your home as detailed in the LHR FPP (FireWise 2000, Inc. 2014). Use only fire-resistant landscaping and maintain the ignition resistance of your home. Assemble emergency supplies and belongings in a safe spot. Confirm you are registered for Reverse 911, AlertSanDiego, and DSFPD alert system. Make sure all residents residing within the home understand the plan, procedures and escape routes.

“SET” – Situational Awareness When a Fire Starts: If a wildfire occurs and there is potential for it to threaten LHR, pack your vehicle with your emergency items. Stay aware of the latest news from local media and your local fire department for updated information on the fire. If you are uncomfortable, leave the area.

“GO!” – Leave Early! Following your Action Plan provides you with knowledge of the situation and how you will approach evacuation. Leaving early, well before a wildfire is threatening your community, provides you with the least delay and results in a situation where, if a majority of neighbors also leave early, firefighters are now able to better maneuver, protect and defend structures, evacuate other residents who couldn’t leave early, and focus on citizen safety.

“READY! SET! GO!” is predicated on the fact that being unprepared and attempting to flee an impending fire late (such as when the fire is physically close to your community) is dangerous and exacerbates an already confusing situation. This LHR Wildland Fire Evacuation Plan provides key information that can be integrated into the individual Action Plans, including the best available routes for them to use in the event of an emergency evacuation.

The County emergency management agencies will continue to evacuate people based upon a protocol that has proven safe and successful for the region. In addition, contingency options are included into their pre-plans so that in the instance an evacuation is considered unsafe, the County will have another option for protecting residents in place.

Under the “READY! SET! GO!” protocol, residents are expected to leave well before any wildfire might arrive into the community. That said, unforeseen conditions (and normal human nature of delaying evacuation to “see just how bad it’s going to get”) could potentially preclude safe evacuation of its residents. However, the very nature of the home construction and landscaping in Lilac Hills should enable emergency managers with the option to direct residents to passively shelter in their homes as a last resort. While certainly not the first choice to advance life/safety, it provides emergency managers/first responders with a contingency alternative that would be safer in instances where attempting to evacuate during a wildfire’s passage is not a preferred option.

Other communities in San Diego have successfully implemented this approach. For example, I personally spoke to multiple residents who lived in “Shelter in Place” subdivisions in Rancho Santa Fe and safely stayed in their homes during the 2007 Witch Creek Fire after evacuation was
precluded. Most stated that while staying in their home was not their preferred option, it was much safer than evacuating as the fire burned around them.

6. Future changes
Some have argued that climate change will greatly increase the potential for wildfires, but new research has shown that there will not be as significant of an impact on southern California shrublands than is anticipated in the coniferous forests of the Sierra Nevada and northern California\(^6\). Indeed, the researchers demonstrated that drier conditions in northern California’s forests will certainly increase potential for large, severe fires there; in southern California shrublands, however, the impact will be significantly less, owing to the fact that the region already experiences a severe annual drought. Instead, southern California’s increasing population will make it more likely that ignitions will occur, which could potentially cause large areas of chaparral to type-convert into grasslands.

Also, it should be noted that continued development has the potential to actually REDUCE the risk of ignition of older developments that were not built with today’s construction standards and codes\(^7\). While this would certainly not be the case if new communities were developed with old building codes, expansion of new development (built to increasingly stringent codes) could buffer older fire-prone communities.

7. A Higher Standard for General Plan Amendments
In reviewing the LHR Fire Protection Plan and associated project features, the following are significant Project features and Public Benefits:

c. Meets State Title 14 (Fire Safe Regulations, SRA).
d. Fire Protection Plan has been approved by the Fire Authority Having Jurisdiction.
e. Undergrounds existing overhead powerlines.
f. Improves water supply system, versus the existing area which doesn't have these resources. Hydrants every 300 feet.
g. Irrigated buffer around project perimeter.
h. Roads are all built to County public and private road standards.

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i. Defensible space around each house meeting code.
j. Clustered development versus existing areas where these parcels are very spread out and more difficult for first responders to defend those structures.
k. Areas of Safe Refuge designed into project that offer contingency for sheltering in place if full evacuation is not possible or delayed.
l. Funding offered for facilities is more than double what is statutorily required by County.
m. Funding offered for ongoing fire staffing significantly above what is statutorily required.
n. Community design creates large ignition resistant landscape/fuel break. Enables law enforcement and fire personnel options and flexibility for firefighting and evacuation or temporary refuge.
o. 39 improvements to local roads and intersections
p. Elimination of dead-end road segments
q. Multiple means (5) of ingress and egress from the project
r. Improved roadway connectivity for 12 different existing dead-end roads during emergencies
s. Improvement of blind curves along primary evacuation routes (West Lilac Road & Circle R Drive).

8. Potential Additional Mitigation Recommendations (over and above current standards)

In my review of many communities and projects that have been able to sustain a major wildfire event, a significant principle that I feel has made a difference between a successful plan and unsuccessful plans is the culture of the community. In combination with the other factors described previously, if the LHR project can effectively create a culture of fire safety, (i.e., engaging the community in maintaining defensible space, fostering automatic behaviors, and creating community educational programs), then the result will be a development with a high level of protection, prevention and preparedness that far exceeds many other communities in the area. That being said, the following list of recommendations are potential additional mitigation features that both the developer and the County can consider in addition to the already robust mitigation found in the Fire Protection Plan.

a. Provide alternatives for Community Gates:
   i. Instead of automatic gates, look at reducing the number of gates and consider Staffing a guardhouse for sole purpose of opening the gate in an evacuation scenario for the remaining gate(s);

b. Provide Enhanced Safety Measures for Common and Privately-Owned Areas:
   i. Inspect all common area defensible space areas annually.
ii. Maintenance to be conducted in defensible space areas, including not only maintaining clearance to native vegetation, but also ensuring that ornamental vegetation is not likely to transmit fire.

iii. Private certification delivered to District that District / CAL FIRE can then verify with its own inspectors

iv. Require HOA enforcement. HOA could issue a “notice of violation” concurrently with District / CAL FIRE inspectors

v. Provide annual report to the Fire Authority Having Jurisdiction, certifying that all common area defensible space is in compliance with state and local regulations.

vi. Enforcement of marked red curb, fire lane parking violations on private roads via agreement with tow company to ensure that roadways and fire hydrants are unobstructed.

vii. HOA to manage abatement of hazards on properties that are not in compliance with defensible space standards.

c. Designate Open Space Areas as Temporary Areas of Safe Refuge
   i. 11 parks, including a 13.5-acre public park
   ii. 2-acre Village green surrounded by 50-foot road ways on all sides
   iii. 10-acre church site

d. Provide Structural Areas of Safe Refuge
   i. Community Center (built to Chapter 7a building standards including commercial sprinklers)
      • Add Non-perishable food and water stored for occupancy load

e. Establish a Community Fire Safe Council (FSC):
   i. Provide continual fire safety and emergency evacuation education in the community.
   ii. Establish specific program goals including (in coordination with HOA activities):
      • Create a Defensible Space Assistance Program (DSAP)
      • Brush and tree trimming/thinning
      • Raking of dead vegetative matter (e.g., leaves, etc.)
      • Chipping of removed vegetation
      • Education about effective defensible space.
      • Initial one-day defensible space clean up
      • Maintaining vegetation along primary evacuation routes year-round

9. Conclusions

For all of the reasons discussed, visits to the proposed LHR development, and the information that I have reviewed, it is my professional determination that the LHR development would
provide a safe area for its residents that would simultaneously benefit the existing region with reduced fire risk via improved evacuation routes and contingency refuge areas, increased fire response and emergency facilities, and a significant investment in fire safety education, prevention and protection.

Finally, LHR is not like Paradise or other communities that were built before current fire standards. The LHR project includes a multi-layered fire protection system that is based on ignition resistant buildings and landscapes, adherence to stringent codes, fire-fighting water availability, swift emergency response, and a sound evacuation planning that includes a contingency option for residents who may be directed to temporarily shelter within the community during a wildfire evacuation. LHR, like other new, master-planned communities, should not be compared with older, less restrictive communities that were not built to the latest codes and ongoing maintenance. Other new, nearby communities have performed extremely well during wildfires and given the LHR’s location, surrounding fire environment, and proposed fire protection plans, it is anticipated that the project will represent lowered risk to both LHR residents and nearby neighboring communities.

10. Christopher A. Dicus CV, select experience

EDUCATION
Louisiana State University: Doctor of Philosophy, Forestry [emphasizing Silviculture]
Utah State University: Master of Science, Forestry [emphasizing Fire Ecology]
Louisiana Tech University: Bachelor of Science (Summa cum laude), Forestry-Wildlife

PROFESSIONAL EXPERIENCE
Professor, Wildland Fire & Fuels Management – California Polytechnic State University, San Luis Obispo, CA, September 2001-2013; September 2016-present.

Interim Associate Dean, Research & Graduate Programs – California Polytechnic State University, San Luis Obispo, CA, September 2015-August 2016.

Faculty Fellow to the Provost – Office of the Provost & Executive Vice President for Academic Affairs, California Polytechnic State University, San Luis Obispo, CA, Sept. 2013-September 2015.

AWARDS & HONORS
• College of Agriculture, Food & Environmental Sciences Outstanding Researcher Award (2011)

PROFESSIONAL LEADERSHIP
• Association for Fire Ecology (an international scientific society)
  o President (2018-present)
• California Fire Science Consortium
  o Coordinator, Wildland-urban Interface Module (2011-present)
• San Luis Obispo County FireSafe Council
  o Board of Directors (2002-present)
**PUBLICATION/PRESENTATIONS**

- Author of 26 peer-reviewed publications (8 via referees/editors, 18 via editorial boards), 21 non-reviewed scientific manuscripts and technical reports, and 19 invited editorials in various print periodicals.
- 92 oral presentations and 13 posters presented at international, national, regional, and local conferences. Invited talks include presentations in 9 foreign countries, including Australia (X5), Portugal, France (X2), Finland, Russia, Japan, China, Thailand, and El Salvador.

**OTHER SIGNIFICANT PROFESSIONAL ACCOMPLISHMENTS:**

- Professional Certifications
  - California Registered Professional Forester
  - Certified Senior Fire Ecologist
- **Honorary Research Associate**
  - Univ. of Tasmania School of Geography & Environmental Studies (Australia) – March-June 2009
- **Australian Black Saturday Bushfire Cooperative Research Center Research Task Force**
- **Fire Behavior Technical Specialist** on major wildland fires
- **Expert Witness in Wildland Fire Litigation** on 3 continents
ATTACHMENT 3
EMAIL TO COUNTY
(HERSHFIELD TO WARDLAW 1/29/2020)
Dear Mark –

Your email of this morning stated:

“I spoke with Dave Nissen, Deputy Chief, to clarify the information that was requested by County Fire Authority. Chief Nissen confirmed the expectation and information requested of your team: “Roadside clearing along West Lilac road shall be provided by an easement and be instituted from Covey Lane to Old Hwy 395. Further, the clearing shall be for both sides of the road and be inclusive of ALL PROPERTIES regardless of current vegetation that may be present. Lastly, the improved width of the roadside clearing shall be 20’ (feet) on both sides of West Lilac road” (emphasis added).

The requirement that we obtain easements on both sides of West Lilac Road is inconsistent with the letter we received from Deputy Chief Nissen on January 8, 2020 coupled with the subsequent direction provided to us by Fire personnel. The January 8th letter reads in relevant part:

“Without 20 feet to clear within the ROW beyond the pavement or an easement from the private property owners on the northeast side of West Lilac Road between Covey Lane northwesterly to the proposed project boundary, an alternative an off-site fuel break easement is required that parallels West Lilac, behind the adjacent residences” (emphasis added). See full letter attached.

Subsequent to receipt of this letter, my team met with Chief Nissen, Dave Sibbet and Mark Slovick on January 9th, 13th and 14th, and participated in numerous phone calls with Fire personnel regarding this topic. In those meetings and calls, the guidance provided by County was that the clearing requirements were along parcels on the northeast side of West Lilac Road between Covey Lane and the Project’s easterly boundary with flammable vegetation, and not along parcels that have ornamental landscaping, privacy walls or agriculture.

It likely makes sense to defer today’s meeting to give parties on both sides time to reach clarity on this requirement. In the meantime, we are continuing to satisfy the requests previously provided.

Thank you.

Best,
Larry
ATTACHMENT 4

MEMO RE: ROHDE REPORT

(SCHREINER)
In accordance with our previous discussions, I have reviewed the materials contained in your most recent submittal for the Lilac Hills Ranch Project that details the various fire safety measures that are proposed for the project. I have also reviewed the Rohde and Associates final report titled “Fire Services Operational Assessment” dated May 6, 2020. Below is a summary of my comments based on this review.

On or about (April 30, 2019) the applicant received input from County Staff detailing fourteen (14) fire safety and evacuation comments that were generated from County Staff and/or the initial County/Rohde and Associates report. In response to those concerns, over the next 8 months, the applicant developed a comprehensive “Wildfire Safety Compendium – Volumes I,” that provides a detailed description of the prior FPP features, and the additional proposed fire safety mitigation features that were to be implemented to address each of the aforementioned comments and concerns. Additionally, the Applicant provided a “Wildfire Safety Compendium Volume II” which included multiple detailed studies and analysis to support the proposed fire safety mitigation measures that were being presented. These documents were submitted to County Fire Authority and County PDS Staff on December 9, 2019 (and revised and resubmitted on January 15, 2020).

Subsequently, and presumably at the request of the County, Rohde and Associates produced a final report called the “Fire Services Operational Assessment” dated May 6, 2020. Unfortunately, the final report appears to rely on inaccurate assumptions that are based on old data which results in many of its conclusions being largely invalid. It appears that the consultant did not use, reference or rely upon the above-mentioned Wildfire Safety Compendium (Vol I and II) that the Applicant assembled over the preceding months prior to issuing this final report. As such, the report does not serve to accurately inform either county staff or county decision making bodies as to critical project design, fire safety or evacuation features that are proposed and their effect on the overall fire safety of the project design. This report in my professional opinion, should be removed from the record, as it bases its conclusions on assumed conditions that have actually been addressed, and therefore has minimal usefulness for serving
or informing either the county staff, decision makers or the applicant on the overall fire safety of the project.

As submitted, and inclusive of the fire and evacuation safety features included in the Wildfire Safety Compendium that are incorporated in the project design, this project appears to meet, and in many cases exceed, all of the requirements found in the relevant local and state fire and building regulations including the State Board of Forestry’s Fire Safe Regulations for State Responsibility Area, the California Fire Code as well as the County Consolidated Fire Code and the County Building Code. These codes, standards and regulations are among the most stringent in the state of California and the nation for building in Wildland/Urban Interface areas.

I have long been a strong proponent of embracing a multi-disciplinary, systems approach to managing risk in the wildland/urban interface environment that drives an extremely rigorous, detailed and thorough review of projects that are proposed in these areas. Having reviewed the project submittal materials and some of the innovative fire and life safety features that are proposed, I have little doubt that this project will effectively “raise the bar”; elevating fire safety standards in the wildland/urban interface environment in San Diego County and throughout the state.

Respectfully,

Gregory Schreiner

Gregory Schreiner
Fire Marshal, San Diego County Fire Authority (Retired)
Senior Fire Protection Planning Consultant
MEMORANDUM

To: Jon Rilling, Village Communities, LLC.
From: Dudek Fire Protection Planning Team
Subject: Response to the Rohde and Associates Report dated May 6, 2020
Date: June 10, 2020
cc: None
Attachment(s): Dudek’s Fire Protection Planning Team’s Responses to Rohde and Associates Comments

Dudek’s Fire Protection Team, with County CEQA certified subject matter experts, thoroughly reviewed the Rohde and Associates Fire Safety Operational Assessment (FSOA) Dated May 6, 2020, which appears to have been prepared without access to the comprehensive LHR Wildfire Safety Compendium, a two volume report that summarizes all fire and evacuation safety project design features and additional mitigations that are proposed by the Project applicant.

The Wildfire Safety Compendium was prepared following review of the original Rohde and Associates FSOA and discussions with County Fire Authority command staff, and addresses stated concerns with a robust package of fire safety and evacuation enhancements that sets a new precedent for project-provided measures in San Diego County. Through no fault of their own, the lack of this important information during Rohde and Associates’ project re-evaluation renders their analysis largely invalid, as it is based on inaccurate assumptions, lack of mitigation measure understanding, and expressed concerns where the issues raising the concern have already been addressed. Attachment 1 provides the detailed responses to the Rohde and Associates’ FSOA, in a line by line format and reviewers are encouraged to refer to these responses for clarification on each of the FSOA’s stated observations, conclusions, and recommendations.
Attachment A

Dudek Fire Protection Planning Team Responses to Rohde and Associates’ Lilac Hills Ranch Fire Safety Operational Assessment
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<th>#</th>
<th>Comment</th>
<th>Response</th>
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<tbody>
<tr>
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<td><strong>The Project</strong></td>
<td>Background information. No response required.</td>
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<td>Lilac Hills Ranch (LHR) is a proposed community development in the</td>
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<td>Valley Center area of north-central San Diego County, California. The</td>
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<td>proposed community includes 1,746 dwelling units for approximately</td>
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<td>5,063 residents on a 608-acre site. 90,000 square feet of commercial/</td>
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<td>retail space are included in a 20.6-acre Town Center portion of the</td>
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<td>development. Also, a 12-acre school site and a new fire station are</td>
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<td>proposed for the community. The development is proposed in five phases,</td>
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<td>generally progressing from the north near West Lilac Rd., progressing</td>
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<td>south. A system of community parks and open space is included in the</td>
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<td>proposal, conserving over 104 acres of sensitive habitat within the</td>
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<td>community footprint.</td>
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<td>Structural fire and emergency medical services are provided to the</td>
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<td>area by the Deer Springs Fire Protection District (DSFPD). Wildland fire</td>
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<td>protection is provided by the California Department of Forestry and</td>
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<td>Fire Protection (CAL FIRE), which also contracts as the operational</td>
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<td>service provider for the DSFPD. The San Diego County Fire Authority</td>
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<td>(SDCFA) has been retained by the DSFPD to provide fire prevention</td>
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<td>services. The author of this report, Rohde &amp; Associates, has been</td>
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<td>retained by the SDCFA to conduct an operational review of the LHR</td>
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<td>proposal.</td>
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<td><strong>Analysis Approach</strong></td>
<td>The Project applicant’s team and the County and Deer Springs Fire Protection District</td>
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<td>Rohde and Associates has assigned 3 staff members to this project who</td>
<td>analyzed the LHR Project in a similar approach used for all other County projects since 2010.</td>
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<td>have over 125 years of collective fire service experience in Southern</td>
<td>The Guidelines for Determining Significance Wildland Fire and Fire Protection have provided</td>
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<td>California, including a nationally recognized wildfire behavior analyst.</td>
<td>the analysis approach and important regulatory requirements that Projects in the WUI or fire</td>
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<td>This team conducted an analysis in two parts. First, we developed a</td>
<td>hazard.</td>
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<td>Fire Services Operational Review for the greater LHR proposed community.</td>
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<td>Second, we created a Wildland-Urban Interface (WUI) Fire Emergency Plan for the current site, using the countywide standard assessment process and planning tools. This WUI Fire Emergency Plan is known as the “West Lilac” plan. The approach to this project is similar to four other major development projects analyzed by Rohde &amp; Associates for the San Diego County Fire Authority in the last several years, and focuses on assessment of the project’s fire and building code compliance, site hazard analysis and mitigation using industry standard models and methods, fire operational concerns, and current wildfire science. This report however is specific to the Lilac Hills Ranch project.</td>
<td>severity zones (FHSZ) must meet in order to be acceptable to fire agencies. The Dudek fire protection planning team, FireWise2000, Hunt Research Corp., Oaks Consulting, Dr. Christopher Dicus, County fire prevention staff (including Greg Schreiner and James Pine) and District Fire Prevention Staff worked collaboratively to require appropriate fire safety features given the site’s fire environment. Combined, the professional fire prevention, firefighting, and fire protection planning experience exceeds 320 years in Southern California.</td>
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<td>While we are aware that additional draft ideas or verbal proposals may have been discussed between the LHR proponent and San Diego County that might affect this study, however they were not considered in this study unless formally presented or detailed sufficiently to allow evaluation.</td>
<td>This comment is noted, but Rohde and Associates did not include the LHR Wildfire Safety Compendium Volume I and II, in the current list of “analysis of related data.” This particular document, prepared in December 2019 and updated in January 2020, includes an exhaustive list of Project-provided fire and evacuation safety features, and studies provided for the project, and the neighboring residents. This document is critical to any analysis of the Project’s overall safety, code compliance, fire operational concerns, and whether it can be considered an approvable project. The fact that Rohde and Associates did not utilize this document for its analysis, renders their conclusions and recommendations largely invalid as they are based on incomplete information and incorrect assumptions.</td>
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<td>Since wildfire has been determined to be the predominant fire risk to the development site, the consultants have been tasked to conduct a wildland fire-centric study. The analysis of related data has included:</td>
<td>See response to Number 3 above. Comment noted.</td>
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<tr>
<td>a.</td>
<td>Fire Protection Plan, prepared on behalf of the project proponent by</td>
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<td>b.</td>
<td>Wildfire Evacuation Plan, prepared on behalf of the project proponent</td>
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<td>by Firewise 2000 of Escondido, CA. May 2014 and June 2015.</td>
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<td>c.</td>
<td>County of San Diego High/Very High Fire Severity Zone data</td>
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<td>d.</td>
<td>San Diego County fuels and topographic mapping.</td>
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<td>e.</td>
<td>State of California Forest Resource and Protection Program (FRAP) data.</td>
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<td>f.</td>
<td>Fire history map data for the LHR planned development region.</td>
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<td>g.</td>
<td>Potential Fire behavior data produced by BehavePlus, FlamMap, and LANDFIRE applications.</td>
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<td>h.</td>
<td>Wildland-Urban Interface Fire Emergency Response Plans, San Diego</td>
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<td>County Fire Chiefs Association, Hidden Meadows plan, Sept. 2014</td>
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<td>i.</td>
<td>Project proponent provided handouts, PowerPoints, and presentations</td>
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<td>Lilac Hills Ranch Wildfire Risk Assessment, C. Dicus (Undated)</td>
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<td>l.</td>
<td>Proposed Modifications to Road Standards and Traffic Study Appendices</td>
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<td><strong>Site inspection and Review</strong></td>
<td>Two site reviews were performed in February and March 2019, including a team visit on Feb. 20, 2019.</td>
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<td><strong>Previous Proponent Studies</strong></td>
<td>This report analyzed and validated portions of two studies developed by the project proponent providing fire protection and evacuation planning for the proposed development site (Firewise 2000, 2015). Additionally, this study reviewed the findings of a traffic study conducted by Fehr and Peers (2019) and Dudek, (2019), and a Lilac Hills Ranch Wildfire Risk Assessment (undated) developed by Christopher Dicus, PhD. This study agrees with most of the fire behavior and fuels assessment conclusions contained within these documents. However, we are in significant disagreement with some of the findings regarding risk assessment, traffic studies related to evacuation planning, proposed fuels management, and related fire prevention mitigations. Our findings and observations are detailed within this report.</td>
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<td>Comment noted. The comment provides no supporting details regarding components of the provided studies that Rohde disagrees with, but refers to later sections of the comment letter. Each of these areas of disagreement are addressed in detail in responses below.</td>
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<td><strong>Site Characteristics</strong>&lt;br&gt;The 608-acre project site is in rural, unincorporated San Diego County, east of Interstate 15 (I-15), south and west of West Lilac Road, and north of Circle R Drive. The site is several miles north of the community of Hidden Meadows, 10 miles west of the community of Valley Center, and 15 miles north of the City of Escondido. The site varies in elevation, ranging from approximately 590-960 ft. The site includes sloping topography covered in many locations by heavy old-age class chaparral, with interspersed agricultural abandoned and active orchard development. The main access to the proposed development is to the north of the site from West Lilac Rd.&lt;br&gt;&lt;br&gt;Approximately one mile north of the proposed development site is Keys Canyon, a major drainage of northwest to southeast orientation that is dominated by heavy chaparral fuels, consisting of elevations from 300-1400 feet. This canyon presents fire corridor characteristics for aiding fire trajectory from east to west, especially when fire is in alignment with easterly winds. While some rural properties are located between the LHR development site and the upper edge of Keys Canyon, heavy fuel continuity exists in many locations which would allow fire movement from Keys Canyon to the edge of the development and West Lilac Road.&lt;br&gt;&lt;br&gt;To the west, 0.25 to 1 mile distant, is the I-15 corridor, which is separated from the proposed development by a 300-foot ridge adjacent to the interstate and two small unnamed canyons. These locations are identified as wetlands in the proposed development plan. While the very bottom of these canyons may be accurately described as wetlands, the upland areas are more typical of inland dry canyons. Much of this area contains a mix of old-age class chaparral and coastal sage scrub. The west edges of the unnamed canyons are interspersed with rural homes and agricultural sites, especially off Old Hwy. 395 and east of I-15. Fuel continuity is available in some locations to allow fires originating along I-15 to enter the fuel load of the site.</td>
<td>The comment generally describes the project site’s location accurately. The comment inaccurately describes the presence of old-age class chaparral occurring in many locations. The site and the surrounding landscape is dominated by agricultural and disturbed land uses, removing native vegetation and resulting in a highly converted landscape that would not facilitate fire spread as chaparral would.&lt;br&gt;&lt;br&gt;The comment downplays the disturbed acreage within Keys Canyon. The upper reaches of the canyon are dominated by large rural ranchettes with cleared and disturbed landscapes and active orchards. The bottom of Keys Canyon includes a higher percentage of native chaparral cover. While it is true that Keys Canyon represents a wildfire corridor, the fuel interruptions from the rural residential land uses between the Project and Keys Canyon would disrupt fire spread and the provided FMZ for Lilac Hills Ranch, along with West Lilac Road and its FMZ, would result in defensible space that wouldn’t facilitate a flaming front at the Project site due to a lack of fuel continuity.&lt;br&gt;&lt;br&gt;While on-shore, wind driven wildfires could be possible, it is clear that wildfire behavior under on-shore conditions are much less aggressive than during an off-shore, Santa Ana condition. Under the comment’s hypothetical on-shore fire condition, wildfire containment and control efforts would be highly successful and the Project’s fire protection features would provide suitable defense, including wide FMZs and ignition resistant construction, amongst many others, similar to every other Project in SD County approved during the last 10 years or more. Per the Wildfire Safety Compendium, FMZs</td>
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15 to move east and potentially threaten the LHR development, especially when aligned with strong on-shore winds. Topographic alignment of the unnamed canyons may also aid such trajectory. Expansion of fuel modification for the planned community may be necessary on its west aspect from the proposed 100 feet to 150 feet to ensure community safety and fire protection from this risk.

South of the LHR development site are several scattered rural homes and agricultural developments with primary access off Circle R Drive. This street runs approximately 0.5 mile to the south of the LHR development. Currently, no permanent access is provided from the proposed community south to Circle R Drive. Fuel continuity is sufficient in some areas to pose significant burn over or entrapment potential to populations using this route during wildfire evacuation.

Immediately east of the proposed development are more rural homes, ranches, and agricultural developments primarily accessed off West Lilac Road. These homes and developments will help to buffer the proposed LHR development from wildfire approaching from the east. Fuel continuity presents entrapment potential to populations using West Lilac Road as an evacuation route, especially where fuel beds rise-up from the Keys Canyon drainage.

Five to seven miles further east of the proposed development is the Lilac community, an enclave of intermixed rural homes and ranches. Ultimately Lilac Rd. terminates in the community of Valley Center. This area is dominated by heavy chaparral fuels and could be subjected to fire trajectory originating in the Valley Center area, burning through this area and ultimately affecting the LHR development as fire continues west under Santa Ana east wind conditions. This factor is important since Valley

have been expanded where a higher fire risk was determined to exist.

The comment considers the existing condition regarding a route from the Project to Circle R Drive and considers a potential for burn over or entrapment. This type of analysis is not useful because it does not consider the post project condition, which is detailed in the Compendium and EIR. The road to Circle R Drive would meet required codes for width, surface, and grades and would be provided roadside FMZ. The concerns expressed, as with much of the Rohde and Associate’s report, are based on the existing condition, which is drastically changed and hardened against wildfire with the Project.

The comment regarding West Lilac Road considers the existing condition. There are potential areas where a wildfire burning from north to south could encroach upon West Lilac Road. With the Project, there would be a roadside FMZ area, enhanced roadway width, and ability to move more vehicles per hour. The comment’s suggestion that evacuating vehicles using West Lilac Road as an evacuation route face entrapment potential is not based on realistic evacuation strategies as during an actual evacuation, if a fire is burning in Keys Canyon and aggressively running up the southerly slope toward West Lilac Road, it is very unlikely that emergency managers would be evacuating vehicles on that road. There would be other options including through the LHR Project to the south and west or even moving existing residents into the LHR Project site for a temporary on-site refuge. The timeframe for wildfire to burn the vegetation at the identified points along West Lilac Road would be less than 10 minutes,
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<td>Center and Lilac area populations may be required to utilize the same evacuation routes as the proposed LHR development.</td>
<td>after which, residents could be moved out of the Project and out of the area. The comment indicates that Valley Center may be utilizing the same evacuation routes as the LHR Project population. This suggestion is not supported by any analysis and conflicts with San Diego County Sheriff’s Department which stated during a Project meeting that a fire burning in Keys Canyon would result in closure to incoming traffic on West Lilac Road both now and with the Project. In that case, Valley Center traffic would be routed south and west while LHR and existing residential would be evacuated via the available routes west including West Lilac Road, Circle R Road, and Nelson Way.</td>
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The development site includes Very High Fire Hazard Severity Zone designation by San Diego County.

![The Lilac Hills Ranch Development Footprint](image)
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<td><strong>Site Assessment</strong>&lt;br&gt;The Rohde &amp; Associates assessment of the LHR project site confirmed the site characterization of the project proponent’s study (Firewise 2000, 2015) in that the area is largely composed of vegetation typical of Southern California coastal and interior chaparral communities. Firewise studies also reported that the site has experienced limited fire history with no large fires on the project site within the last 50 years. We concur with this assessment but note that large fires occurred within the region before and after the Firewise 2000, 2015 survey period. It is noted that fuel concentrations of heavy mixed chaparral on the project site exceed 50 years of age, a critical fuels factor. Small areas of riparian vegetation and coast live oak woodland also exist on the LHR site. Topography is generally sloping and rugged, with the proposed development concentrated on the northern and upland portions of the site. Much of the structural development proposed for the northwest, west and southwest sides of the proposed development is located adjacent to heavy mixed chaparral and coastal sage scrub fuels.</td>
<td>The comment concluding similar results from its assessment as the Firewise 2000 assessment is noted. The comment’s assertion that the site’s topography is rugged requires context. Rugged terrain would include steep slopes with ridges and valleys. The site includes gently sloping terrain with some small, broad topped ridges and shallow valleys that support riparian vegetation. From a fire behavior modeling perspective, topography is not the driving factor for fire behavior on the LHR site. The development adjacent to chaparral and coastal sage scrub in the northwest, west and southwest is being setback from these fuels a minimum of 100 feet, as would any project in San Diego County. The FMZ that provides a buffer from these fuels is considered appropriate and has been used for similar fuels throughout San Diego County on approved projects.</td>
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<td><strong>Fire History</strong>&lt;br&gt;In the past, large fires have frequented the region, especially under Santa Ana wind/extreme fire behavior conditions. The proponent’s Fire Protection Report cites that no fires have occurred on the development site within 50 years. However, large fires have occurred historically both north and south of the project site. In our study, 3 prominent large fires are noted, one of which has occurred since the Firewise reports were prepared. The largest area fire cited by Firewise was the 2007 Rice Fire, which burned 11 miles north near Fallbrook, destroying 248 structures and burning 9,472 acres.</td>
<td>The comment’s discussion of past wildfires in “the region” is noted. The assessment includes wildfires as much as 11 miles from the site. Based on this analysis, it is factual to state that virtually every new development that has been approved over the last 20 years in San Diego County is subject to similar conditions where wildfires have burned in the region under Santa Ana Wind conditions. &lt;br&gt;&lt;br&gt;a. Regarding the comment’s indication that the Project’s evacuation planning identified unimproved Lancaster Creek Road as a potential route, it is not considered an evacuation route in any of the FPP/Evacuation Plans that were prepared for this Project. The latest submittal (“Compendium Volumes 1 and 2”) clearly did not identify Lancaster as an evacuation route.</td>
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<td><strong>Fire History Map for the Lilac Hills Ranch Proposed Development Site</strong></td>
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<td>The three fire events of importance identified by this study include:</td>
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<td>a Rose Fire (1956): This fire points to the importance of Keys Canyon as an historic fire corridor under Santa Ana winds. The Rose fire, which was supported by Santa Ana winds, closely followed canyon terrain in its trajectory with a roughly east-west path. This fire is believed to have occurred during the same wind event that drove the fatal Inaja Fire in the San Diego River watershed that year. This fire behavior suggests that evacuation routing identified by the project proponent on unimproved Lancaster Creek Road within the Keyes Canyon drainage would be dangerous to travel during Santa Ana wind driven wildfire. Fire under such conditions would also threaten West route. Further, the initial evacuation plan prepared by Firewise 2000 was superseded with subsequent, comprehensive evacuation modeling that included two traffic engineering firms, a transportation planning firm and an evacuation planner that has prepared similar evacuation plans for other County projects approved over the last five years.</td>
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<td>b. The landscape vegetation and disturbance levels have changed significantly since the 1938 wildfire singled out in the comment. To suggest that a fire would behave and move similarly is ignoring these landscape level changes that have a major impact on wildfire movement and behavior. Agricultural, rural residential, roads, and other landscape changes disrupt fuels and result in modified fire behavior.</td>
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<td>c. The 2017 Lilac Fire mentioned in the comment is considered to be a very successfully managed wildfire and evacuation, including the equestrian component (Lilac Fire After Action Report). A large number of people were successfully evacuated on limited, rural roads and the County's evacuation phasing system worked as planned to reduce road congestion. Similarly, law enforcement and fire personnel successfully controlled key intersections in the area so that traffic could be moved when needed.</td>
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<td>The comment suggests that the fuels that facilitated the 2017 Lilac Fire's spread were consistent with those in and around the LHR Project. This is incorrect. In fact, the primary way that the Lilac Fire spread was in the San Luis Rey riverbed, which is heavily treed with substantial dead and down understory. The fire burned along this corridor, driven by the wind, and made runs on adjacent slopes that were naturally vegetated.</td>
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<td>This study suggests that these fire events can be specifically referenced with respect to the proposed LHR development due to their geographic proximity, similarity and continuity of fuels, fire weather influences, topography and similar rural siting of development. Significant areas of no recorded fire history also exist for some portions of the proposed LHR site and these islands of old-age class chaparral will be proximal to new homes in post development. These fuel beds have a potential for high</td>
<td>The FPP and related fire behavior modeling included analysis of the fuels, terrain and weather that the Project would be subject to over the long term. The resulting requirements for FMZ, landscape, and building ignition resistance directly contemplate the types of wildfires that would be anticipated from off-site, adjacent fuels. It must be noted that the fuels directly adjacent to the site’s wide FMZs are limited in their overall extent and would have a very fast burn time, measured in minutes, not hours. The structures and landscape would</td>
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<td>Lilac Road and potentially compromise its use as an evacuation route.</td>
<td>The fire was stopped or burned out when it met developed landscapes. Where older homes were unprotected by inadequate fuel modification and/or were vulnerable to embers, they were lost if in the fire's path. This is a very different situation than would be experienced at the LHR Project where the FMZ would be provided and maintained and the buildings would be built to withstand wildfires and embers.</td>
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<td>Unnamed Fire (1938): The importance of geographic influence of the two unnamed canyons on the southwest side of the proposed development is demonstrated by a fire occurring in 1938. While we cannot ascertain the exact dates of the 1938 fire, it would appear this fire may have ascended these canyons during up-canyon, onshore wind-driven conditions. This fire behavior suggests that under similar conditions these canyons may once again channel wildfires to the proposed south and west boundaries of the development.</td>
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<td>Lilac Fire (2017): Wind-driven, extreme fire behavior occurred in fuels similar to LHR adjacency and ran with high rates of spread and long-range spotting during the Lilac Fire, which occurred immediately across the I-15 freeway and a few miles west of the proposed LHR development on Dec. 7, 2017. This fire burned 4,100 acres, destroyed 157 structures and forced the evacuation of 10,000 people. This was a significant wildfire characterized by entrapped populations, compromised evacuation routes and significant structural loss.</td>
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<td>thermal outputs, long-range spotting, extreme fire behavior, and both weather and topographic driven burning conditions.</td>
<td>perform well against this exposure, as have similar landscapes and structures throughout southern California that are built to similar standards. The existing chaparral fuels are all on the west or south side of the proposed development areas. Large fires that include the most aggressive fire behavior occur during Santa Ana wind events. During these events, the fire would be burning east to west/north to south, so these fuels would include fire burning away from the project, or at the least, being heavily influenced by the wind and countering any terrain fire behavior affects.</td>
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<td>Critical Fire Weather: Offshore Winds</td>
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<td>The LHR site is subject to seasonal Santa Ana winds, a foehn wind type which characteristically dries native vegetation to critical fuel moisture levels, develops high wind speeds and low relative humidity, and drives historic wildfires in the region. Critical fire weather episodes are typically associated with Santa Ana wind events. The proponent’s Fire Protection Plan cites the nearby 2007 Rice fire as an example of potential fire behavior. Winds during the Rice Fire were cited at 41 MPH, with gusts to 100 MPH. Santa Ana winds flow in an offshore, east or northeast pattern and have occurred in every month of the year but are characteristic of the September through February period. Santa Ana winds are influenced significantly by local terrain, which funnels through canyon topography and intensifies wind speeds. During Santa Ana wind events, the following average weather conditions have been recorded affecting the proposed development site:</td>
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<td><strong>Max. Temp.</strong>- offshore winds</td>
<td><strong>Min. Relative Humidity</strong></td>
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<td>100-108 degrees F.</td>
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The comment provides basic fire environment information that is not in conflict with the LHR Fire Protection Plan or EIR.
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<td>Source: Valley Center RAWS</td>
<td><strong>The 2017 Lilac Fire immediately west of the project site was typical of such events. For planning purposes, the proponent’s Fire Protection Plan considered a 60 MPH Santa Ana wind as a worst-case event. This study agrees with this finding. Fires originating in the Valley Center area and west will be of significant concern during these episodes, and under Red Flag fire warning conditions can spread fire rapidly to affect the LHR project site. The Keys Canyon drainage will significantly impact fire trajectory, should wildfire become established in this corridor.</strong></td>
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<td>Critical Fire Weather: Onshore Winds</td>
<td>The comment provides basic fire environment information that is not in conflict with the LHR Fire Protection Plan or EIR. The type of fires described in this comment have been contemplated in the Project’s FPP and subsequent fire analysis and corresponding Project Design Features summarized in the Wildfire Safety Compendium Volumes I and II.</td>
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The site is subject to a Mediterranean climate, with dry, warm summers and brief, wet winters. This results in summer critical fire weather, especially in the late summer months from July through September. Summertime critical fire weather events are frequently associated with prolonged periods of high temperatures, low relative humidity, low fuel moistures associated with seasonal drought, and moderate diurnal/onshore winds. While fire behavior can be extreme under these conditions, wind speeds are typically less severe than during Santa Ana wind events. The typical weather pattern for these conditions is diurnal flow, onshore/up canyon winds during the day, peaking in the afternoon and lighter offshore/down canyon winds at night. For planning purposes, the proponent’s Fire Protection Plan considered a 35 MPH onshore wind as worst-case event. This study agrees with this finding. The following average onshore wind conditions have been recorded for the late summer period:
### #12 Effect of fuels

The heavy accumulations of old-age class chaparral and coastal sage scrub exceed 50 years in many locations, adjacent to the proposed community site. This is a stage at which these fuels reach maximum thermal output potential. Some pockets of live oak riparian woodland also exist but are generally confined to canyon bottoms and along water courses. Fuel continuity exists in a number of locations along primary roads (see map p.16), which could allow for significant fire development and compromise of travel/escape routes. The Fire Protection Plan (Firewise 2000, 2015) report cites the most significant LHR community risk will occur on the northwest, west and south portions of the proposed development. While this study concurs with this observation, we also note that areas adjacent to West Lilac Road, to the north of the proposed development, also carry a high fire spread potential and may burn with sufficient intensity to obstruct escape on West Lilac Rd. and pose a civilian entrapment threat. These specific areas have direct

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<td>Effect of fuels</td>
<td>The comment indicates “many locations” for old-age class chaparral adjacent to the proposed Project site. This statement is not supported by fact. A map should be provided with the comment to indicate where these many locations occur. It is likely that the commenter is overlooking the fact that existing chaparral/shrub fuels on the site’s development areas will be converted to ignition resistant landscapes. Please refer to response to comment 6 regarding West Lilac Road and its potential for civilian entrapment and how the Project addresses these issues. Please also refer to the Wildfire Safety Compendium for details on fire and evacuation related features on-site and off-site, along area roads, that will improve evacuation conditions, result in more evacuation route options, and offer the contingency of on-site sheltering.</td>
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* Source: Valley Center RAWS
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<td>Areas of agricultural or structural development offer breaks in native fuel continuity and, while insufficient to obstruct all large fire growth, may offer opportunities for temporary safe refuge or limit wildfire growth under less intense fire behavior conditions. Areas of native fuels have been proposed for inclusion within the LHR planned development as interior fuel islands and, since area fire behavior has determined spotting potential of 1.5 miles or more, these sites may pose concern for ignition through spotting from adjacent large fires.</td>
<td>The interior fuels that include native species would be along restored riparian drainages. These riparian fuels would include high internal plant moisture due to their locations, which in turn results in much higher ignition resistance. Also, these areas would be maintained through the removal of dead and dying vegetation and non-native species. These areas are flanked by agricultural and/or FMZ, providing appropriate setbacks from the nearest ignition resistant structures. The entire Project can be used to temporarily refuge residents and the Project has gone further by providing a high occupancy, designated temporary refuge building within three phases. There are also large, open areas where people and livestock from neighboring properties, could be refuged during a wildfire event.</td>
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<td>The second threat from the old-age class fuels is the potential for development of plume- dominated/fuel-driven wildfire behavior. This phenomenon occurs when high energy outputs from heavy, burning old-age class fuels creates an intense thermal column. This column develops dynamics similar in many ways to thunderstorm development, with severe in-flow and out-flow winds which are column dynamics driven rather than controlled by ambient wind conditions. Additionally, the uplift provided by the column dynamics lifts burning materials high into the column, where they later fall-out ahead of the fire causing extreme and long-range spotting. Extreme conditions such as fire whirl development are also commonly associated with this phenomenon. While this is generally associated with large fire behavior, the process is thought to begin with fires as little as 40-50 acres in size and requires heavy fuel beds and very high to extreme burning conditions as contributors. Spotting distances achieve maximum downwind firebrand distribution potential under these burning conditions, estimated by our Fire Behavior Analyst for this site as far as 1.5 miles or more ahead of the main fire.</td>
<td>vegetation described that are adjacent to the Project occur downwind of the Project in the southern portion of the property. These areas, if wildfire occurred today under Santa Ana winds, could produce embers that are blown long distances away from the Project. This condition changes slightly with the removal of some of this fuel type for development, but does not change in terms of wildfire post-project could also produce long range embers. The off-site fuels that occur from the Project's adjacency in the southwestern corner and continue southwest toward Palos Verde Drive exist today and are not associated with the Project. The Project contemplates these fuels and provides increased fuel buffers of 150-feet to not only protect LHR, but to minimize the possibility that an accidental fire spreads off the LHR into these fuels.</td>
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<td>A significant concern here is that fire protection infrastructure such as ember resistant walls have been proposed to serve to reduce ember cast into developed areas. Such infrastructure may be defeated by firebrands developed by fuel-driven, extreme fire behavior and should not be relied upon alone for structural ignition resistance.</td>
<td>This comment is confusing the actual proposed design features and is not considering the latest Project information contained in the Wildfire Safety Compendium. The Project provides ignition resistant structures, built to the latest ignition resistant codes, provides a minimum of 100-150 feet of FMZ on the Project’s perimeter, includes site-wide ignition resistant landscaping, and would provide landscape walls, if needed, for further fire protection. Landscape walls are an acceptable form of barriers that can, especially when located at the top of a slope, deflect heated air and flame. Additionally, these walls can capture airborne and ground based, wind-blown embers. In no case does the Project rely only upon these walls, as described, the comment has misunderstood the proposed approach and the commenter should refer to the Wildfire Safety Compendium for details.</td>
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<td>Our assessment indicates the potential for development of plume-dominated/fuel-driven fire conditions during extreme fire weather/behavior adjacent to the development site. Specific areas include the northwest, west and southwest portions of the project, due to adjacency to heavy fuel beds, and from ember cast for fires moving in Keys Canyon. Concern also exists for heavy fuels which may be isolated within the community as native vegetation islands, which may be subject to ember-driven ignition. This finding will accentuate the need to harden LHR structures and interior open spaces against burning firebrands and ensure significant defensible space/fuel modification presence. While this assessment is specific to this project site, such a finding could also be applied to other proposed project sites with adjacency to heavy old age class fuels, and where historic fire behavior and trajectory patterns demonstrate that a proposed project is potentially subject to similar fire effects.</td>
<td>The comment is noted and has been addressed in Response to Comments 6, 7, 8, 9, 12, 13, and 14. It should be noted that several other Projects have been proposed in San Diego County with similar fuels adjacent to some of their perimeter FMZs. These Projects were rightly approved because of similar fire safety features, which have been shown through after action reports and save-loss assessments to work in providing fire hardened communities. Note, the photograph indicating a plume dominated/fuel driven thermal column is from the Station Fire, which originated in the Angeles National Forest and in fuels that are very different from those in the LHR Project area. The Station Fire burned on steep slopes and in fuels that included dense oak woodlands and pine forests. The limited fuels directly adjacent to the LHR Project and the gentle slopes are vastly different than the Angeles National Forest. The plume illustrated would be associated with a large fire burning many more acres than occur immediately adjacent the site.</td>
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<td>Long range spotting from these areas may also compromise evacuation routes at some distance from the LHR development, especially under episodes of rapid-fire movement, heavy spotting, or extreme fire behavior. This accentuates the need for early evacuation of the community, or temporary safe refuge in situations where early evacuation is not possible or too late to affect. In either case, community</td>
<td>This comment is noted and is consistent with the fire protection and evacuation planning analysis conducted for the LHR Project. It is also an assessment that applies to every other San Diego County wildland urban interface project approved over the last decade or more. The Project has contemplated this potential at levels beyond that provided for</td>
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<td>road access may be lost due to decreased visibility, fire impingement, or firebrands. A strong temporary safe refuge strategy for retention of populations within the community as a last resort is recommended.</td>
<td>any other approved project in San Diego County. Where issues were identified, project design features and other mitigating measures were developed by a multi-faceted team of fire prevention and protection professionals. The Wildfire Safety Compendium provides important details.</td>
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<td>National fire research by Cohen (2008) and Manzello (2014) have identified that firebrand casting is a large factor in ignition of structures in the Wildland-Urban Interface. Since the proposed project will likely be subjected to fire branding from adjacent wildfires, this consideration should cause developers to consider extensive protection from firebrands for the proposed development in structural design, use and placement of ornamental vegetation, placement and design of structural features such as decks, gazebos and external structures, structural setbacks from vegetation, modification of native fuels in internal community islands and other related actions. These conditions should include focus on attic vents, eaves, roofing materials, exterior fencing materials and ornamental vegetation restrictions.</td>
<td>The comment is noted. All of the suggested structural ignition resistance factors have been contemplated and would be addressed on the LHR Project.</td>
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|  19 | Effect of slope

Most of the proposed development will be situated on or near sloping terrain. Nearly half of the proposed project, 141 acres, will be situated in terrain with 15-30% slopes, another 110 acres positioned on 0-10% slopes, and an additional 54 acres of the project will be situated on slopes exceeding 35%. These steepest slopes are not proposed for development and are generally located in the south and west portions of the project. Slope has the potential to accentuate fire spread rate by a multiplier of 3 to 5 times over that in flat terrain. For the portions of this project with steeper slopes, additional fuel modification may be necessary to cope with accentuated flame lengths and fire behavior. This is especially true on the northwest, west, and southwest portions of the project, or wherever final landscape grading may be 35-40%. Slopes also run north into Keys Canyon from locations along West Lilac Road. | The site’s slopes have been analyzed and based on fire behavior modeling associated with the slopes and the type of vegetation that would be present, post Project, are considered to be adequately addressed with the proposed fire safety features. For example, an interior Project slope that is landscaped, irrigated and maintained does not represent a significant threat from a wildfire perspective. The slopes that are off-site, particularly in the southwest, and that would include unmaintained fuels were modeled and recommended FMZ equal to a minimum of twice the flame length was originally proposed. Since then, the FMZ has been expanded to 150 feet, as described in the Wildfire Safety Compendium, and site-wide, the FMZs provide setback from off-site fuels that ranges between 2.5 and 5 times the modeled flame lengths. This is consistent or better than other approved Projects in San Diego County over the last 10 years or more. |
with grades approaching 45%. The effect of slope on wildfire behavior is roughly to double the rate of spread and flame lengths for every 30% of slope added to level ground.

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| 20 | Fire Rate of Spread  
The wildfire rate of spread has been modeled in this study using BehavePlus, LANDFIRE, and FlamMap fire behavior prediction programs. Mapping from this modeling has been included in the Wildland-Urban Interface fire plan for this site (attached) that depicts both onshore and offshore wind scenarios under worst case fire behavior conditions. Fifty years of historical weather, historical fire behavior from nearby wildfires and current fuel mapping have been calculated into this modeling. Results indicate that under critical fire weather and extreme fire behavior, rapid rates of spread may be expected, averaging 3-6 MPH for Santa Ana wind-driven conditions, a critical rate of spread. Additionally, rate of spread will be enhanced by spotting and firebrands ahead of the main fire front, which can be significant when fires burn in heavy, old-age class fuel beds.  
Rate of spread was calculated in this study for the proposed development site. A range of findings is presented which represents study in both coastal sage scrub and mixed chaparral fuels. Results of this study found: | This comment is noted and is consistent with the analysis provided in support of the Project’s EIR. |

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<th>Wind direction</th>
<th>Average Rate of Spread</th>
<th>Worst Case Rate of Spread</th>
<th>Avg. Flame Lengths</th>
<th>Peak Flame Lengths</th>
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<td>Offshore</td>
<td>8,230-13,200 ft/hr.</td>
<td>13,200-18,489 ft./hr.</td>
<td>11-14 ft.</td>
<td>35-45 ft.</td>
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<td>Onshore</td>
<td>1,320-3,300 ft/hr.</td>
<td>3,300-4,620 ft./hr.</td>
<td>4-8 ft.</td>
<td>20-32 ft.</td>
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*worst case
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<td>21</td>
<td>Fire Behavior Studies and Implications</td>
<td>This comment is noted and is consistent with the analysis provided in support of the Project’s EIR. Note that the fire behavior modeling for the project, conducted by two different CEQA certified County experts, is more conservative than the modeling conducted by the non-CEQA certified Rohde and Associates team, resulting in a more aggressive wildfire behavior result which was used for fire protection planning purposes by Firewise 2000 and the Project’s fire protection planning team.</td>
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<td>A comparison of this study and the proponent’s Fire Protection Study (Firewise 2000, 2015) yielded small differences in fire behavior calculations. Equal peak flame lengths (45 feet) were determined in both studies, but there was a lower rate of spread (3.5 MPH in this study vs. 5.61 MPH in the proponent’s study). These inconsistencies may be due to different geographic computation points and fuels, or fire behavior modeling techniques. Both studies however have identified a rate of spread in excess of 3 MPH, which meets National definition for an extreme rate of wildfire spread, which would correlate with potential for extreme fire behavior with high difficulty of control, therefore the studies are largely in agreement. More advanced fire behavior modeling systems were utilized in this study that historically yield higher resolution results due to the high-hazard nature of the proposed development site.</td>
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<td>Fire Ignition Sources</td>
<td>The comment inappropriately applies general, human caused, wildfire ignition information to a master planned community without support for the statement. In fact, there is no data identifying an ignition resistant community like LHR with increased fire starts. It is true that humans (i.e., human related activities or human created features, services, or processes) are responsible for the majority of California wildfires (Syphard et al. 2007, 2008; Romero-Calcerrada et al. 2008). Certain human activities result in sparks, flames, or heat that may ignite vegetative fuels without proper prevention measures in place. These ignitions predominantly occur as accidents, but may also be purposeful, such as in the case of arson.</td>
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<td>Numerous studies have identified that human caused wildfire is linked to population growth (CAL FIRE, Keeley, et. al.) and is an inescapable result of any development in the Wildland-Urban Interface. This is partially mitigated by adherence to robust fire and building codes during development, improved fire services, effective fuel modification and maintenance, and fire safety/evacuation planning. All of these have been proposed in this project. In Southern California, human caused ignition is the primary cause of wildfire. Additional studies have determined that major transportation corridors, such as the I-15 freeway, are a significant source of wildland fire ignitions. This factor is of concern given the proximity of the I-15 on the west side of the project.</td>
<td>Roadways are a particularly high source for wildfire ignitions due to high usage and vehicle caused fires (catalytic converter failure, overheated brakes, dragging chains, tossed cigarette,</td>
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and others) (Romero-Calcerrada et al 2008)). In Southern California, and San Diego County, the population living, working, or traveling through the wildland urban interface is vast and provides a significant opportunity for ignitions every day. However, it is a relatively rare event when a wildfire occurs, and an even rarer event when a wildfire escapes initial containment efforts. Approximately 90 to 95 percent of wildfires are controlled below 10 acres (CAL FIRE 2019; Santa Barbara County Fire Department 2019).

Research indicates that the type of dense, master planned developments, like Lilac Hills Ranch, are not associated with increased vegetation ignitions. Syphard and Keeley (2015) summarize all wildfire ignitions included in the CAL FIRE – Fire and Resource Assessment Program (FRAP) database – dating back over 100 years. They found that in San Diego County, equipment-caused fires were by far the most numerous, and these also accounted for most of the area burned, followed closely by the area burned by power line fires. Ignitions classified as "equipment caused," frequently resulted from exhaust or sparks from power saws or other equipment with gas or electrical motors, such as lawn mowers, trimmers or tractors and associated with lower density housing. In San Diego County, ignitions were more likely to occur close to roads and structures, and at intermediate structure densities.

As figures 1 through 3 illustrate, housing density directly influences susceptibility to fire because in higher density developments, there is one interface (the community perimeter) with the wildlands whereas lower density development creates more structural exposure to wildlands, less or no ongoing landscape maintenance (an intermix rather than interface), and consequently more difficulty for limited fire
resources to protect well-spaced homes. CALFIRE and County Fire Chief Tony Mecham has publicly stated: “Very important - clustered development notion. One of the most difficult challenges we have is with existing areas where these parcels are very spread out. This development is clustered, meaning it is going to take less resources for us to defend those structures.” (Board of Supervisors, September 25, 2018)

The intermix includes housing amongst the unmaintained fuels whereas the proposed Project converts fuels within the footprint and provides a wide, managed fuel modification zone separating homes from unmaintained fuel and creating a condition that makes defense easier. Syphard and Keeley go on to state that “The WUI, where housing density is low to intermediate is an apparent influence in most ignition maps “further enforcing the conclusion that lower density housing poses a higher ignition risk than higher density communities. They also state that “Development of low-density, exurban housing may also lead to more homes being destroyed by fire” (Syphard et al. 2013). A wildland urban interface already exists in the area adjacent to LHR, dominated by older, more fire-vulnerable structures, constructed before stringent fire code requirements were imposed on residential development, with varying levels of maintained fuel modification buffers. As discussed in detail throughout this FPP, LHR is an ignition resistant community designed to include professionally managed and maintained fire protection components, modern fire code compliant safety features and specific measures provided where ignitions are most likely to occur (such as roadways). Therefore, the development of the Project would not be expected to materially increase the risk of vegetation ignitions.
- **Figure 1.** Example higher density development that is ignition resistant and excludes readily ignitable vegetative fuels throughout and provides a perimeter fuel modification zone. This type of new development requires fewer fire resources to defend and can minimize the likelihood of on-site fires spreading off-site.
Figure 2. Example of moderate density development. Homes are located on larger properties and include varying levels of ignition resistance and landscape / fuel modification provision and maintenance. This type of development results in a higher wildland exposure level for all homes and does not provide the same buffers from wildfire encroaching onto the site, or starting at a structure and moving into the wildlands as a higher density project.
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- **Figure 3.** Example of “lower density” development where homes are interspersed amongst wildland fuels, are of varying ages, and include varying levels of fuel modification zone setbacks. Homes are exposed on most or all sides by flammable vegetation and properties rely solely on owners for maintenance, are often far distances from the nearest fire station, and have minimal buffer from on-site fire spreading to wildlands.

Moreover, frequent fires and lower density housing growth may lead to the expansion of highly flammable exotic grasses that can further increase the probability of ignitions (Keeley et al. 2012). This is not the case with the proposed project as the landscapes are managed and maintained to remove exotic fuels that may establish over time.
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<td>Fire Behavior Mapping</td>
<td>The modeling provided by Rohde and Associates indicates a wildfire occurring with the existing conditions. The data inputs were not provided, but assuming that the largely agricultural and disturbed landscape was appropriately categorized into fuel models, the results are not very useful because they do not indicate fire spread with the proposed Project land uses, FMZ’s, road network and infrastructure. The Project’s land uses would reduce fire spread rates, slowing fire spread considerably due to the conversion of readily ignitable fuels like non-native grasses and other largely unmaintained fuels to highly maintained, irrigated, and low fire hazard species.</td>
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<td>The results of fire modeling for the proposed development area yields fire trajectory mapping which predicts how fire would move on the landscape. Two projections have been completed based on conditions at the LHR site as it is currently (pre-development). They illustrate the fire behavior that may be encountered by direct flame impingement on the LHR boundary and through spotting. One projection is for Santa Ana/offshore wind conditions. A second illustrates onshore wind conditions. Both calculations utilize worst-case weather and fuel conditions from a 50-year data base. Both projections calculate a 6 hour...</td>
<td>As discussed above, research indicates that it is less likely for higher density developments to be impacted by wildfires than lower density developments. The same protections that starve wildfire of fuels and minimize or prevent wildfire from transitioning into a higher density community such as LHR also serve to minimize or prevent on-site fires from transitioning into the wildlands. Further, the requirement that all structures will include interior fire sprinklers significantly reduces the likelihood that a building fire spreads to the point of flashover, where a structure will burn beyond control and produce embers. Interior sprinklers are very efficient, keeping fires to the room of origin, or extinguishing the fire before the responding firefighters arrive. Similarly, the irrigated fuel modification zones are positioned throughout the development areas as well as the first zones on the perimeter of the project. Irrigated zones include plants with high internal moisture and spacing between plants and plant groups that 1) make it difficult to ignite and 2) make it difficult for fire to spread plant to plant. Lastly, the on-site fire station, Fire Safe Council, communications network and additional “eyes on the street” would result in fast detection of fires and fast firefighter response, a key in limiting the growth of fires beyond the incipient stage.</td>
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# Comment | Response

| Burn period. If the theoretical origin is moved to another location under similar conditions, the same fire progression would likely occur. | There would not be a unified flaming front through the Project. It is anticipated that a fire from the north would burn in a spotty manner around the Project in the largely agricultural areas that are adjacent the Project. In a large wind-driven fire, embers would be produced and would blow into the Project, but would not find favorable fuel beds to ignite sustainable fires. The scenario modeling a fire from the west burning east is also a current condition model and does not contemplate the converted landscapes associated with the Project and its benefits on reducing fire spread and behavior. On-shore wind driven fires are less aggressive, include higher humidity and plant moisture, and lower wind speeds, making them typically easier to control. |

*Off-shore wind-driven fire projection*
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<td><strong>Climate Change Impacts</strong>&lt;br&gt;Climate is currently changing for the region and disturbance has occurred in traditional Santa Ana wind periods, rainfall amounts and timing, summer peak temperatures and related factors. An example of this change was the occurrence of a rare, critical fire weather/Santa Ana wind period in May of 2014. This resulted in a wildfire series in San Diego County, in the surrounding area of this development location, and a multi-year critical drought episode. The ultimate final state of this change has not been determined, but available data suggests that drought and critical fire weather episodes will continue to occur during non-traditional periods. Climate change is likely also apparent in the dieback of native vegetation as a result of pest infestation, disease and drought effects, which contributes to potential fuel loading.</td>
<td>The comment introduces possible climate change fire regime changes, but provides no supporting data or research. As indicated in the Lilac Hills Ranch Wildfire Risk Assessment prepared by Dr. Chris Dicus (Professor of Wildland Fire and Fuels Management - Cal Poly San Luis Obispo) some have argued that climate change will greatly increase the potential for wildfires, but new research has shown that there will not be as significant of an impact on southern California shrublands than is anticipated in the coniferous forests of the Sierra Nevada and northern California (Keeley, J., and A. Syphard. 2016. Climate change and future fire regimes: examples from California. Geosciences 6:37, 14pp. Indeed, the researchers demonstrated that drier conditions in California’s forests will certainly increase potential for large,</td>
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| 25 | **Evacuations**                                                                                                                                                                                | The project proponent has detailed an evacuation plan for wildfire for the proposed development. The project generally utilizes existing road infrastructure except for the addition of new streets within the proposed development itself. The LHR project calls for ignition and fire spread resistance hardening, for a portion of West Lilac Rd., where it has frontage on the proposed development. Approximately 5,063 residents are projected to occupy the new community at build-out. A traffic study by Fehr and Peers (March 2019) did not calculate a total time for evacuation of this population, however using Federal Emergency Management Agency guidelines, it is likely that such a population would require 1.5 hours or more for evacuation.  

The comment indicates that the Project utilizes existing road infrastructure except for the addition of new streets within the Project itself. This is consistent with virtually every approved new Project in San Diego County over the last 10 or more years. However, in addition to the Project internal roads, the Project would enhance existing roads including West Lilac Road, Nelson Way, Mountain Ridge Road and Circle R Drive, all off-site improvements would increase the evacuation capacity of these roads. The amount of time needed to evacuate LHR would vary by the type of incident, the number of evacuation routes utilized, the amount of mobilization time, and other factors. The FEMA guidelines of 1.5 hours or more is a general estimate and the Project would meet that timeline or be substantially in conformance. However, it must be clear... |
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|  | Historical evacuation experience during past San Diego County wildfires has found limited cooperation by large portions of communities to evacuation warnings. Many people hesitate to leave until late in the evacuation period, leading to traffic congestion during peak threat times. It will be important for LHR and public safety services to stress to residents the potential dangers associated with a delay of evacuation during community wildfire threats. | that there is no evacuation timeframe threshold that Projects must meet in order to avoid a CEQA impact or to be consistent with codes, regulations or policies. Regardless, the Project has provided a comprehensive evacuation evaluation, beyond what has been provided for any other approved large residential project in San Diego County, and the results are comparable, if not better than similar, approved projects.  

Historical evacuations during San Diego County wildfires have evolved over the last roughly 20 years. According to Sheriff Captain Dave Brown, “[w]e had a more shotgun approach in the past having managed evacuations on the ’03 and the ’07 [fires]…we keep getting better at our ability and county OES now has the ability for us to essentially draw on a map exactly who we want notified so we can go street by street or neighborhood by neighborhood, as opposed to Ramona in ’07 - we just evacuated the whole town.” (September 25, 2018)  

This evolution has occurred through lessons learned from actual large, mass evacuations and has included a significant investment in technologies and procedures to avoid the type of late leaving scenario described in the comment. The Lilac Fire in 2017 was a perfect example of the technology and procedures in use and was a very successful evacuation of a large number of residents on limited, rural, windy roads. To illustrate this point, in 2018, Chief Mecham stated to the Board of Supervisors, “[t]he overriding point is we become much more surgical in how we’re going to do evacuations.” (September 25, 2018) Using computerized messaging and implementing phased evacuation was very successfully used and is stark contrast to the 2003 and 2007 wildfires that resulted in mass evacuations with no phasing. |
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<td><strong>Evacuation Triggers</strong>&lt;br&gt;Our analysis highlights that early evacuation will be essential to the success of such an action. Given that a maximum rate of spread for Santa Ana wind-driven wildfires was calculated at 3-6 MPH, and for onshore winds at near 1 MPH, fire management action points can be established where nearby fires should trigger evacuation. In addition to fire rate of spread, an additional 30 minutes must be added as reflex time to effectively activate and broadcast emergency messaging. Given these calculations, the following management action points are recommended for the proposed LHR community:&lt;br&gt;&lt;br&gt;Evacuation Initiation:&lt;br&gt;&lt;br&gt;a. Santa Ana wind-driven fire: Any significant wildfire approaching the project from the east from Valley Center, moving west of Cole Grade Road. Or moving southwest of the Community of Pala/State Hwy 76, cresting the ridge south of Pala and entering the community of Lilac. Evacuation should be halted when the fire moves west of Couser Canyon Rd. and/or Lilac Rd. into Keys Canyon. A temporary safe refuge strategy should then be employed.&lt;br&gt;&lt;br&gt;</td>
<td>The comment is consistent with evacuation planning conducted for the LHR Project. Early evacuations are the preferred approach, but the LHR Project also contemplates scenarios when early evacuation is not possible and offers a contingency plan where residents and neighboring property owners could be directed by law enforcement to temporarily refuge on the site, either in designated refuge buildings, in large open areas, or within vehicles on the community’s streets until the fire front passes around the outer edges of the community. According to Fire Chief Mecham, commenting on a different project in 2018, this concept of designated areas of temporary safe refuge is extremely valuable:&lt;br&gt;&lt;br&gt;“One of the things that we see with newer developments that are built to the modern fire safe standards that include larger road segments, fuel modification, water supplies, oftentimes, it is much safer to leave people in their communities than put them on the road. And in a newer development with higher density, it allows us to deploy our firefighting resources kind of on the edges of the project as opposed to having to put a fire engine at every house.” (September 25, 2018)&lt;br&gt;&lt;br&gt;The provided evacuation initiation (trigger point) is noted. The County would follow its internal pre-fire plan for evacuations or base them on real-time fire behavior and movement, which may or may not include implementation of the Rohde provided trigger point.</td>
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<td>b. Onshore wind-driven fire: A significant fire aggressively approaching the community moving east of the I-15, between Old Castle Road and State Route 76. Evacuation should be halted when well established fires east of I-15 move east or north of Circle R Drive from Moosa Canyon or near the proposed LHR community across Palos Verdes Drive. A temporary safe refuge strategy should then be employed.&lt;br&gt;&lt;br&gt;</td>
<td>The provided evacuation initiation (trigger point) is noted. The County would follow its internal pre-fire plan for evacuations or base them on real-time fire behavior and movement, which may or may not include implementation of the Rohde provided trigger point.</td>
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<td>Use of these geographic points for initiation of evacuation should provide the community best opportunities for successful relocation. Threatening fires starting closer than these points will require public safety professionals to consider whether time is still available to complete civilian evacuation safely. If travel on roadways is not safe, temporary safe refuge options should be utilized.</td>
<td>The comment is noted and is consistent with standard operation procedures for emergency management during wildfire events.</td>
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<td>29</td>
<td>Evacuation Routing</td>
<td>The comment conflates the evacuation plan prepared for LHR with an out of date preliminary concept. The proposed PACE evacuation routes, which indicate a layered approach to evacuation safety that does not rely on a limited number of evacuation options, has been replaced with a newer map of alternatives in the Fire Safety Compendium. Note that the emergency route (Lancaster) to the north is not being considered for the evacuation network, which suggests that Rohde and Associates is not working from the most current set of facts and assumptions. The comment incorrectly indicates that the Project would only harden West Lilac Road along the Project frontage. According to the Proposed Conditions of Project Approval 4 and 9, removing, clearing, and/or modifying combustible vegetation (Fuel Modification) in the offsite area within 20 feet from each side of West Lilac Road from Circle R Drive to Old Highway 395 and Circle R Drive from West Lilac Road to Old Highway 395 (Designated Route).</td>
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![Evacuation routing proposed by the project proponent](image)
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<td>The project proponent has identified several potential routes of evacuation from the proposed development. Key to this proposal is the identification of four classes of routing:</td>
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<td>a. Primary Routes: Including West Lilac Road and Circle R Drive.</td>
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<td>b. Alternate Routes: Including most proposed streets within the development, Lilac Road east to Valley Center, Mountain Ridge Road, and Old Hwy. 395</td>
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<td>d. Emergency Routes: Including Lancaster Creek Road. e. Regional Routes: Including I-15 and SR76</td>
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<td>The project proposes to modify landscaping along West Lilac Road commensurate with a development boundary only. This effort is undertaken in part with the intent to reduce ignition and fire spread potential from or across West Lilac Road.</td>
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<td><strong>Traffic and Evacuation Concerns</strong></td>
<td>The commenter’s opinion regarding evacuation route safety is noted. However, several fire and emergency management professionals and traffic engineers have provided opposing opinions with sufficient evidence to support them. The comment provides no supporting data.</td>
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<td>This study carefully considered routing proposed by the project proponent and does not agree with the safety of many of the routes identified by the project proponent. During field analysis, all the proposed routes were evaluated. While gating was originally proposed for all project entries, later proponent offers have included gate removal to increase vehicle access and improve emergency response.</td>
<td>The current proposal clearly indicates that all gates would be removed, with the exception of two gates that would be staffed with a 24/7 gate guard. The removal of Project gates is</td>
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<td>times. This proposal however needs to be confirmed by the project if it is still in effect.</td>
<td>detailed in the LHR Wildfire Safety Compendium and would be a Project condition of approval.</td>
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<td>The findings of this study include:</td>
<td>The comment's opinions are noted. However, the comment provides no evidence, calculations, or supporting evacuation route assumptions supporting the opinion. Conversely, the studies conducted by several experts provide evidence that the improvements proposed by the Project, including increasing vehicle capacities on West Lilac Road and Circle R Drive along with additional options for evacuation, such as Nelson Way, provide substantial improvements to the existing condition, not the least of which is providing a temporary refuge destination for existing residents in the vicinity of the Project. Please refer to response to comment 6 for details regarding the routes that may be used by Valley Center residents during an evacuation.</td>
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<td>a. Primary Routes: Both West Lilac Road and Circle R Drive are two-lane roads which are subject to compromise by fire movement at various locations. This creates entrapment potential and may block evacuation efforts. One of the proponent's traffic studies (Fehr and Peers, 2019) initially assumed only a limited number of additional existing residences (66) adjacent to the proposed development might utilize the routes for evacuation. However, it is likely that the greater Lilac Road community, with a population near 10,000, east of the proposed development between the LHR site and Valley Center, would also likely use either West Lilac Road or Circle R Drive to attempt evacuation from a Santa Ana wind-driven wildfire originating near or moving west of Valley Center-Pauma Valley. Road capacity is estimated in both the Fehr and Peers and Dudek (2019) traffic studies. This research has identified that traffic demand near the project site would exceed road capacity without traffic improvements.</td>
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<td>Both traffic studies identified a requirement for two out-bound traffic lanes on West Lilac Road to meet evacuation needs. Traffic capacity on this section of West Lilac Road is limited to between 1,330 vehicles per hour (Fehr and Peers, 2019) or 1,270 vehicles per hour per lane per the Dudek study (2019). These same studies have estimated a traffic demand between 2,660 vehicles (Fehr and Peers, 2019) to 2858 vehicles (Dudek, 2019) per hour during evacuation of the proposed LHR development. The results of either study congest the available single traffic lane, and this is without consideration of any additional impact of regional evacuee traffic. Estimates using a single traffic lane are that it</td>
<td>The comment confuses the results of the traffic studies prepared for LHR. The planned improvements to West Lilac Road and Circle R Drive would add a middle lane that could be used by emergency managers as an additional outbound lane during a wildfire emergency. This lane doubles the capacity of these existing roads while still leaving an inbound lane for emergency responders. The capacity of West Lilac Road would double from approximately 1,300 vehicles per hour currently to approximately 2,600 vehicles per hour with the Project’s planned improvements. Evacuation of Valley</td>
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<td>The Fehr and Peers study (2019) proposed to accomplish evacuation without traffic lane improvements using “contraflow”, which requires the use of all available lanes outbound, both east and west bound lanes. The second Dudek (2019) study suggests conversion of existing lanes to eliminate available road shoulders and create an uncontrolled 14-foot median lane which potentially could be used passively during evacuation. Analysis of both proposals evidences area of concern. Contraflow has been viewed by the SDCFA as unworkable given the limited capacity of regional law enforcement to conduct both rescue, evacuation, and simultaneous traffic management of this area. A significant expanse of roadway would need traffic controls to safely implement contraflow. Contraflow would also compromise the ability of emergency responders to access the area. In the 2018 Camp Fire in Paradise, California; traffic contraflow was attempted on Skyway Road, a main evacuation route to Chico. Lack of law enforcement availability to manage chokepoints and intersections caused an 8-mile traffic gridlock, leading some civilians to become trapped in their vehicles or causing them to flee vehicles on foot. A number of deaths have been attributed to this condition. This finding conflicts with the finding of the Dicus report, Lilac Hills Ranch Wildfire Risk Assessment (undated) where the author rejects similarity between the 2018 Camp Fire in Paradise, CA and the proposed project.</td>
<td>Contraflow is not proposed by the Project. Instead, a middle lane would be striped on both West Lilac Road and Circle R Drive such that this middle lane could be used to double the capacity for evacuation while still enabling an inbound lane for emergency responders. San Diego County Sheriff’s Department has stated publicly at Planning Commission and Board of Supervisor’s hearings for projects that were approved, that they can mobilize a large number of officers in a short timeframe virtually anywhere in this part of the County. Further, once a middle lane is used for evacuating traffic, following traffic will follow and will not need constant monitoring. The intersections at Old Highway 395 would be controlled so that evacuating traffic could be directed onto the road and minimize bottlenecks. Comparisons with the Project area and Paradise (Camp Fire) are not valid (See the Wildfire Risk Assessment, July 2019, by Dr. Dicus). The differences in fire environment, fuels, and evacuation routes and their exposure, are so vastly different that comparisons yield clarification of the contrasts and lack of similarities.</td>
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<td>The proposed median uncontrolled lane would likely also require traffic controls to affect safe use. Secondly, to physically create this lane,</td>
<td>The comment does not appear to have been based on the LHR Wildfire Safety Compendium which details the road</td>
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<td>existing primary lane widths would be reduced from 20 to 18 feet, eliminating shoulder areas. This design would eliminate the ability of traffic to yield to emergency vehicles and compromise movement of fire apparatus and other large vehicles given reduced road width. The median lane would be of insufficient width to accommodate most large vehicles including some fire apparatus. Both proposals would modify traffic lanes for a limited distance from the project boundary west to I-15.</td>
<td>improvements. The Project would provide significant off-site evacuation road improvements as detailed in the Compendium. Additionally, the road width reduction referred to in the comment are not accurate. The proposed additional lane does not reduce total width, it results in 3 lanes that meet the code for 12’ wide travel lanes, for both West Lilac Road and Circle R Drive with input from the County Department of Public Works, which is in charge of approving road standards. Therefore, the comment is incorrect and based on faulty information. In addition, the improvements to a total of 40 existing offsite road segments or intersections will be implemented by the Project as project design features, mitigation measures and conditions of project approval. These improvements to existing road infrastructure will provide safety benefits to both LHR and regional residents and enhance capacity, connectivity, mobility, evacuation capability, and ingress of emergency vehicles. The improvements include the elimination of three (3) blind curves and the signalization of four (4) currently unsignalized intersections along the existing evacuation routes, as well as a segment of West Lilac Road not currently built to County road safety standards. (See</td>
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<td>In the opinion of this study, both proposals fail to permanently or effectively mitigate the single traffic lane constraints identified within the proponent's traffic studies. Development related traffic impacts suggest that evacuation traffic could vastly exceed capacity and congest this road. This study concludes that the currently proposed traffic improvements are insufficient to mitigate development related evacuation demand and would likely degrade regional evacuation potential.</td>
<td>The opinion of the commenter is noted. The opinion is based on the commenter’s understanding of the Project and its provided roadway and other fire safety features. This understanding is not complete as it is clear that Rohde and Associates was not provided all of the Project’s detailed approaches to fire and evacuation safety, particularly the comprehensive Wildfire Safety Compendium. Further, the comment provides no substantiating evidence to its claims that regional evacuation potential would be degraded. The comment provides no specific inquiries regarding the Project’s evacuation modeling and planning, provides no</td>
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| 36 | Additionally, the project has proposed use of traffic circles for intersection control which may further reduce capacity for large vehicles and fire apparatus. Large agricultural vehicles and horse trailer traffic are common on West Lilac Road.                                                                 | This comment is noted and is based on lack of information. The traffic circle (roundabout) details are provided in various submitted documents, including in the Dudek Evacuation Travel Times memo dated December 9, 2019. The roundabouts are designed to provide seamless traffic flow, even when the middle lane is activated during an evacuation, providing two 12 foot lanes and one middle, 14 foot lane, with a painted/rumble strip apron and middle lane. The roundabouts are designed to facilitate movement of larger vehicles including fire engines, delivery vehicles, and large pickups with livestock trailers without causing traffic congestion. Various studies indicate that there may be some minor slowing of fire engines when compared to a traditional intersection, but even if this delay occurred, it is not significant in terms of fire response. See Attachment A, Appendix 2: “West Lilac Road Roundabout Detail. Per Federal Highway Administration Publication No. FHWA-14-098:  

- Roundabouts are designed for safety and efficiency of all users and can actually improve emergency response times by eliminating/minimizing stops and delays.
- Roundabouts are safer than intersections, even when signals are fitted with preemption devices.
- Emergency vehicles slow down to pass through intersections similarly to slowing down to proceed through a roundabout.
- Roundabouts accommodate larger vehicles and often include rolled curbs and truck aprons for rear wheels. |
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<td>b. Alternate Routes: Mountain Ridge Road is currently a private road and</td>
<td>Finally, roundabout experts, Reid Middleton, provided a peer review (included as EIR Appendix A) on the design and analysis of the proposed roundabouts. Based on Reid Middleton’s findings, both roundabouts along West Lilac Road would operate at LOS A with low volume-to-capacity ratios. Review of this analysis in the context of evacuation indicates that the roundabouts would not likely create incremental evacuation delay not already considered in the road capacity discounts.</td>
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<td>the developer had proposed limited access only to proposed assisted living housing rather than the community at large, except by emergency gated access. Full community access would not routinely be allowed via this route. Should this route not be secured for LHR general use, the proposed development will only have a single primary route of access/egress to the north to West Lilac Road. This condition, unless mitigated effectively, will complicate evacuation, emergency access and response routes and times, and likely not meet County Consolidated Fire Code requirements for emergency access. As it is in its current state, this dirt road is narrow with tight 90 degree turns and is unsuitable for either fire apparatus access or safe evacuation from the community. An additional route, Covey Lane may connect with West Lilac Road and offer access. Both Mountain Ridge and Covey Lane configurations will likely impact Fire service response times in the currently proposed configuration, and the issue of gating of these access points remains undetermined.</td>
<td>This comment is based on incomplete information, which would clarify for the commenter that Mountain Ridge Road would be modernized from its current condition. The Wildfire Safety Compendium details that Mountain Ridge Road would be improved to applicable County standards, including resolving a blind curve issue that currently exists. The road would be an integral component of the Project’s circulation plan. Gates would be removed from all interior roads except for a gate on Mountain Ridge Road that is manned 24/7 with a security guard and a gate on Nelson Way that would be controlled by fire and law enforcement agencies. The following condition has been proposed in the Wildfire Safety Compendium, which the County apparently did not provide to Rohde and Associates for its review:</td>
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<td>&quot;In order to enhance orderly evacuation and emergency access, Phases 4 and 5 of the Project shall have no gated access,&quot;</td>
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<td>access points, with the exception of (1) manned 24/7 guard gate on Mountain Ridge Road and an existing gate along Nelson Way, which will remain, but will be rebuilt and upgraded to meet County and DSFPD standards will be incorporated into the Lilac Hills Ranch Guard Gate system operated by the guard gate on Mountain Ridge. Lastly, the Project has proposed evacuation routing signage via both fixed and changeable message signs to direct and route evacuation traffic.</td>
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<td>In the northern part of the proposed development, the project has proposed an alternative &quot;Belly road&quot; within the project for transport of evacuation traffic around West Lilac Road. This proposal would shield some traffic movement from potential fire behavior originating from Keys Canyon by placing it interior to the community for a short distance. However, the road would reconnect with West Lilac Road at the project boundary and transfer the point of congestion ¾ mile west from the originally proposed intersection. Ultimately, the Belly road does not relieve traffic congestion during evacuation on West Lilac Road.</td>
<td>The &quot;Belly road&quot; (eg. The &quot;Roundabout Connector Road&quot;) is provided as an optional route that provides additional flexibility for evacuations along West Lilac Road. In response to the County’s concerns regarding Keys Canyon and West Lilac Road’s proximity, the Belly road provides a fire hardened corridor that is further from Keys Canyon and protected by converted, ignition resistant landscapes and developed areas. The Belly road provides options, if appropriate to move traffic west back onto West Lilac Road for the short segment to Old Highway 395, it would be facilitated by the planned, wide roundabout at the West Lilac Road roundabout and the roadside FMZ all the way to Old Highway 395. However, if conditions were such that evacuation to the west were not advisable, traffic could be routed south, through the Project to other potential evacuation routes, including the improved Mountain Ridge Road or Covey Lane to Circle R Drive, or via the modernized Nelson Way to Old Highway 395. The importance of the Belly road is that it provides optionality to those managing an evacuation and does so within a fire hardened corridor. According to the County Sheriff Captain Dave Brown, &quot;options are in many ways more important than capacity for evacuations.” (Applicant meeting with County - April 2019)</td>
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<td>c. Contingency Route: Nelson Way has been identified as an emergency evacuation route that will be gated and prohibited from public use under normal conditions. In its current state, it is currently a partially paved single lane road secured by an iron gate owned by the local water district. The road travels in close proximity to heavy native vegetation fuel beds offsite of the LHR project where fire entrapment could be a threat. The project has considered improvement of Nelson Way to 28-foot width County standards, along with conduct of appropriate fuel modification, and extension of the road from the community to I-15 on the west. This proposal has merit for reduction of traffic congestion impacts on West Lilac Road, estimated at 20% reduction by project traffic studies (Dudek, 2019). This route could create an alternative for evacuation for a portion of the proposed development to Old Hwy. 395/I-15, however needed road design and related information necessary for full analysis has not yet been provided by the project to allow full consideration by the County, and concern exists for how the public might access or use an unfamiliar route during time of emergency.</td>
<td>The comment suggests that Nelson Way improvement has merit for reducing traffic on West Lilac Road, but lacks details for full consideration. Nelson Way has been analyzed and details for modernization provided in the Wildfire Safety Compendium, Volume II, Attachment 8. Nelson Way modernization is a proposed condition of the Project’s approval. Nelson Way, like many of the other planned off-site improvements to West Lilac Road, Circle R Drive, and the on-site Belly road are robust evacuation facilitating improvements that enhance fire and law enforcement agency flexibility during an evacuation. Wildfires are fluid events and can change at any point, having flexibility and options for directing people out of an area or to a designated point of temporary refuge (like LHR offers) are extremely valuable for evacuation success.</td>
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<td>d. Emergency Route: Lancaster Creek Road had been identified in early traffic studies as an emergency escape route. This unimproved narrow, single lane dirt road travels north from West Lilac Road and descends into Keys Canyon to the area just east of I-15. This road transcends a deep canyon and historic fire corridor that would be subject to dangerous and lethal entrapment conditions during wildfire movement. On the day the road was field surveyed, washouts, slides and storm damage were apparent that would inhibit travel. No maintenance or improvement of this road is proposed by the development. Due to these hazards, it is unreasonable to consider this road for evacuation purposes.</td>
<td>This comment is noted and its conditions and use during a wildfire are accurate. The early evacuation approach included a consideration for a PACE model where the primary, alternative, contingency and emergency options were evaluated. Again, this route is not being suggested or included in the current Project application.</td>
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<td>e. Regional Routes: While I-15 and SR 76 are designated as primary regional routes for evacuation, it should be noted and considered in evacuation planning that both routes are historically heavily congested during past wildfire emergencies. This factor may affect success of planned evacuations from the LHR community.</td>
<td>The comment is noted, but has been considered in evacuation planning conducted for LHR. San Diego County Sheriff’s Department confidently states that it can control downstream intersections and maintain traffic flow where and when needed. I-15 (an 8-lane international transportation corridor) and SR-76 are considered relatively hardened corridors with limited exposure to prolonged wildfire and where traffic has</td>
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| 42 | Roadway Fuels Management | The comment summarizes Rohde and Associates earlier work identifying potential burn over areas and the County requested 20 foot roadside FMZ along specific routes. This information was incorporated into the Project’s fire safety approach and plans for roadside FMZ have been presented within the LHR Wildfire Safety Compendium. The Project would fund ongoing roadside FMZ along important evacuation routes including West Lilac Road, Circle R Drive, and Nelson Way, in addition to all on-site roads.  

The comment recommends that 50 feet of FMZ be provided at 8 specific locations on West Lilac Road north of Circle R Drive, however fails to provide details regarding the recommended expansion to 50 feet or the type of fuel reduction that would be needed, i.e., tree thinning and crown raising, understory removal, or total vegetation removal. It is important to note that most of these 8 locations would be avoided by directing west bound traffic onto the Project’s Belly road. Please refer to response to comment 38 for details why the Belly road is beneficial in this regard. |

With regard to the primary evacuation routes, 19 locations have been identified where fire movement across either West Lilac Road or Circle R Drive is likely, presenting a significant civilian entrapment potential. Eight of these locations are on West Lilac Road north of the intersection with Circle R Drive, outside of, but adjacent to the development footprint. Keys Canyon drops steeply north from West Lilac Road. At these noted locations, flame lengths of up to 40 to 60 feet could be expected and could move over West Lilac Road, compromising its use for escape and potentially entrapping motorists. In the 2003 Cedar Fire, such occurrences led to multiple civilian fatalities in the Lakeside area of the Barona Indian Reservation near Wildcat Canyon Road. As such, the SDCFA proposed that West Lilac Road receive project sponsored fuel modification treatments to ensure safe evacuation of vehicles. The SDCFA proposal called for 20 feet of fuel modification on either side of the 20-foot roadbed, with the project arranging for permanent easements and financing. |

been temporarily “stored” during active wildfires until it needed to be moved. |
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<td><strong>X:</strong> Potential locations of fire movement across primary evacuation routes</td>
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<td>In our review of this proposed mitigation, the cumulative 60 feet of clearance was found to be inadequate to reduce fire impacts on West Lilac Road. Wildfire rising up and out of Keys Canyon could cross this barrier and directly impinge flames on traffic. The proposed 60-foot mitigation would minimally provide protection for homes on the south side of the road but not include effective protection of the roadbed itself. In reference, other areas of the project are required to provide 100 feet of fuels clearance to protect homes. This study concludes that a minimum of 50 feet clearance is required for traffic safety, especially on the downhill side of the 8 identified locations with entrapment potential north of Circle R Drive.</td>
<td>The LHR Wildfire Safety Compendium provides detailed information for the designated temporary refuge buildings and refuge sites in Sections 3.3.2 and 3.3.3, suggesting that Rohde and Associates did not review the current application</td>
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<td>Several areas within the proposed development are identified by the project as temporary safe refuge for LHR residents during wildfire. These include:</td>
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<td>a. A 20.6-acre Town Center with 90,000 square feet of commercial development b. A 12-acre school site c. A church site and community center (size yet to be defined) d. 10 acres of small parks in 10 sites</td>
<td>as of the date of this Report. The Project’s approach to temporary on-site refuge is consistent with the comment, which indicates use of on-site sheltering as a last resort. The Project promotes on-site refuge as a contingency plan in the event that an evacuation is considered unsafe or if an ongoing evacuation becomes unsafe. This on-site sheltering capability in such a robust approach is precedent setting in San Diego County.</td>
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<td>These areas serve as a refuge of last resort during wildfire and should not be considered as a better option in lieu of evacuation if the roadways are safe to travel. These sites may still be exposed to heavy smoke concentrations, ember cast and other fire effects, but will likely offer survivable space during wildfire movement. While this study is in general agreement with this concept, the project has not identified the size, structural configuration, or specific location of several of these facilities and full determination for their resistance to wildfire is awaiting this information.</td>
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<td>44</td>
<td>An elder care/assisted living facility is included in the proposed development. This site offers additional complexity for evacuation due to the presence of potentially non-ambulatory populations. Movement of non-ambulatory populations requires more preparation time, vehicles and logistics to accomplish evacuation safely. This issue is not addressed in the project’s evacuation plan. Recent wildfire experience in Paradise, California during the 2018 Camp Fire showed severe fire damage to such a facility, despite being built to high building standards. This demonstrates a need for additional consideration of fire resistiveness of such facilities and for development of facility specific evacuation plans.</td>
<td>The comment provides important safety information regarding the Project’s planned assisted living facility. The facility would be constructed to codes consistent with the ignition resistant requirements of Chapter 7A with the addition of ember resistant vents rather than relying on wire mesh to keep embers from entering building interiors. Wide FMZ would also be provided around the facility. A facility focused emergency response plan would be required by the Fire Code for this facility and would address evacuation protocols including transportation, responsibilities, training, and on-site sheltering, amongst others.</td>
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<td>45</td>
<td>Protection of In-Situ Populations</td>
<td>The comment is noted. The evacuation plan deliberately follows the San Diego County Emergency Operations Plan’s Evacuation “Annex Q” regarding sheltering in place/on-site</td>
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<td>Under extreme fire behavior conditions, responders should prioritize protection of populations seeking shelter in large community spaces such as developed parks, churches and commercial centers. While such action is incorporated within the project's Fire Protection Plan, additional emphasis is needed to define how stranded populations will be protected in place. Recommendations should be added to the evacuation plan calling for specific deployment to protect stranded populations and infrastructure development at these sites which resist wildfire ignition and spread.</td>
<td>refuge. Because wildfires are fluid events, the evacuation plan defers to the on-site fire and law enforcement personnel, who work in conjunction with the Office of Emergency Services and/or the Incident Command in making decisions regarding sheltering on site and related protected actions. To the extent that the County requests additional on-site sheltering information in the evacuation plan, that can be conditioned to be included, along with a timeframe, and it will be added.</td>
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<td>46</td>
<td>Evacuation Summary</td>
<td>The comment refers to reviewer conclusions that are outdated or missing critical information, resulting in inaccurate assumptions and invalid conclusions. The comment is correct that the existing routes of access were deemed insufficient for evacuation with the Project. However, the assumption that the road improvements are limited to the Project’s route is not accurate and the reviewer is referred to the Wildfire Safety Compendium for details on improvements to area roads that create substantially more traffic capacity and result in acceptable evacuation times that are consistent with the Rohde and Associates report’s 90 minute timeframe. The comment is accurate regarding Nelson Way and its ability to mitigate many traffic concerns, but is not accurate that related information and studies have not been submitted. The Wildfire Safety Compendium, the traffic evaluations by Dudek and Fehr and Peers, and a Nelson Way specific memorandum all address Nelson Way’s modernization in great detail.</td>
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<td>47</td>
<td>Additional constraints exist for the lack of dedication of access for Mountain Ridge Road. It is unclear if there is ample space to make the necessary improvements to this road to make it a viable route for evacuation and emergency apparatus access. This condition may also not be compliant with San Diego County development standards, as the</td>
<td>This comment repeats earlier concern regarding Mountain Ridge Road and whether it will be provided or not and whether it will meet applicable code requirements. Mountain Ridge Road will be a Project condition and will be built to County</td>
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<td>48</td>
<td>Lack of access to this route will leave the community with only one way in and out.</td>
<td>Private Road standards, and will meet the SRA Fire Safe Regulations and the County Consolidated Fire Code.</td>
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<td><img src="Image" alt="Traffic congestion as the Cedar Fire crosses the I-15, 2003." /></td>
<td>Please refer to previous response to comment #s 6, 31, 32, 39 and 42 regarding evacuation routes, fire entrapment, and road improvements, which the comment reiterates and are based on incomplete data for Rohde and Associates review. The information is contained in the current Project application, but apparently was not used by Rohde and Associates. Please refer to response to comment 45 regarding on-site assisted living populations and 43 and 44 regarding on-site sheltering at temporary refuge sites.</td>
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<td>Some proposed contingency evacuation routes are dismissed by this study as unreasonable due to potential gridlock, fire entrapment or dangerous conditions for use. Road improvements that are currently offered by the LHR project do not effectively alleviate travel impacts. Additional planning effort should also be directed for non-ambulatory populations within the LHR community, especially in assisted living housing. Additional detail should be provided by the project to better define temporary safe refuge options within the proposed LHR project.</td>
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<td>49</td>
<td>The project proponent has included the development of a Ready-Set-Go plan and Firesafe Council to communicate evacuation planning.</td>
<td>The comment states correct information that raises no issues and is consistent with the EIR and the Project’s approach to fire safety.</td>
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<td>50</td>
<td>Given the limitations for effective fire evacuation and access, additional hardening may be necessary within the proposed LHR community for structure fire resistance. Additional measures for landscaping/defensible space, areas of safe refuge, attic and related structural ember</td>
<td>The comment recommends fire hardening within the LHR community along with landscape, areas of safe refuge, attic and structural protection, and treatment of native vegetation islands. All of these items have been addressed by the Project and are detailed in various documents including the</td>
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<td>51</td>
<td>Fire Protection</td>
<td>The comment states accurate information that raises no issues with the EIR or its conclusions.</td>
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<td>The proponent has considered fire service emergency response times and services in their reports (Firewise 2000, 2015). Response time analysis has been conducted with the proponent's finding of a 5-minute response time (from the time an apparatus departs the Fire Station to the time it reaches the dispatched address) to the entire community. Fire sprinklers have been proposed for all occupied structural development, as well as permanent fire station construction for a Deer Springs Fire Protection District station within the project.</td>
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<td>At the time of this study, potential consolidation of the CAL FIRE Miller Fire Station 15 (9127 West Lilac Road) into a new fire station facility within the LHR development was an active proposal. A second proposal would leave the CAL FIRE facility as a separate entity at its existing location, with the construction of a separate Deer Springs Fire District facility within the development.</td>
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<td>52</td>
<td>The Deer Springs Fire Protection District currently maintains 3 fire stations and CAL FIRE operates the fourth facility (Miller Station 15) within the District. This State facility is staffed year-round by local County agreement and provides local responsibility coverage. Current response activity within the District is 3.74 calls per day. (Firewise 2000, 2015). Potential call loading from the LHR community is projected at 3.9 additional calls per day at build- out. Since the nearest Fire Station to the development, the CAL FIRE Miller Station, currently experiences 1.22 calls per day, this increase in demand should be within the capacity of the currently available staffing.</td>
<td>The comment is noted and is consistent with the Fire Protection Plan and EIR.</td>
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| 53 | The project’s Fire Protection Plan (Firewise 2000, 2015) indicates that the current Miller Station will be 4.5 minutes from the furthest structure in the LHR development; however, relocation to a new fire station facility within the development may shorten this response time. Backup service for fire response from other existing District Fire Stations is required for structural or wildland fire response, or backup response, should the closest fire crew be committed. The District’s entire standard structural fire response will be able to arrive within 10 minutes, meeting the District’s standard according to the Firewise 2000 report. The District also maintains a response standard for 6 minutes for the first due paramedic engine. | All gates would be removed from the Project’s roads except for two gates – one on Nelson Way and one on Mountain Ridge Road, which would be manned 24/7 by a security guard, ensuring that it can be opened quickly and retained in the open position during an evacuation. The LHR Wildfire Safety Compendium details the gate removal plan. A Project Condition of Approval has been proposed to ensure that Mountain Ridge is constructed as follows:  

“In order to enhance orderly evacuation and emergency access, Phases 4 and 5 of the Project shall have no gated access points, with the exception of (1) manned 24/7 guard gate on Mountain Ridge Road and an existing gate along Nelson Way, which will remain, but will be rebuilt and upgraded to meet County and DSFPD standards will be incorporated into the Lilac Hills Ranch Guard Gate system operated by the guard gate on Mountain Ridge.” |
<p>| 54 | At the time of this study, the original project had been proposed with numerous locked emergency access gates that would restrict regular road access to much of the community. This proposal would delay access by fire and emergency resources. The project proponent, however, has recently indicated that 5 or 6 gates might be removed. Further detail has yet to be provided by the proponent that would allow full evaluation of this concept. This study raised concern for timely response by backup stations given lack of access due to gating or road connectivity which cannot be answered at this time. | In the absence of this detail, firm conclusions regarding development response times are not yet achievable. Given the proximity of the CAL FIRE Miller Station, the proponent’s verbal proposal of emergency locked gate removal within the development, and the assumption that response times would at least be met by the Miller Station existing location, The comment is noted. Due to the location of a co-located fire station at the existing Miller Station site or an on-site fire station, the County’s 5 minute travel time is achievable for all planned residential and other structures, regardless of which site is ultimately selected. Dudek conducted GIS based |</p>
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<td>this study believes that the proposed development’s response travel time may likely meet District response standards. Concern still exists for the extreme south-end of the project, off Mountain Ridge Road, where a proposed assisted living facility would likely generate high call volume but be furthest from the Community’s fire station. Full analysis was confounded in this study by the lack of current agreement on final fire station location and the yet to be defined final status of road gating.</td>
<td>response modeling utilizing standard speeds and an algorithm that accounts for deceleration and acceleration at intersections and the model (Network Analyst) indicates that the Miller Station site results in 5 minutes or less response throughout the Project site. Since the options for fire station location are defined, modeling is straightforward from the two sites.</td>
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<td>55</td>
<td>Detailed tract mapping indicating street design, fire flow/water systems, and housing type (retirement/multi-family, single family, etc.) has not been provided by the proponent for this study; nor has a detailed analysis been conducted on these characteristics. The proponent’s plan has called for fire hydrant distribution meeting suburban development standards. These aspects will need to be considered as part of fire services assessment for this proposed development. However, proposed mitigations, along with fire and building code compliance, fuels management and other proposals included in the Firewise 2000 study (2015) are typical for such code-compliant community development and are generally reasonable mitigations in comparison to similar projects elsewhere in Southern California. The project proponent has proposed full compliance with Building Code Chapter 7A, the current codified practice in California relative to Wildland-Urban Interface fire resistance. No occupied buildings taller than 35 feet are proposed for the development, however a single non-habitable structure may exceed 35 feet.</td>
<td>The comment is correct that the Project will be compliant with required fire, building, and residential codes pertaining to fire safety. Many of the details will be determined at later stages of planning and would be subject to fire prevention review/plan check.</td>
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<td>56</td>
<td><strong>Defensible Space</strong>&lt;br&gt;The majority of homes in the proposed development will have a 100-foot fuel modification zone. As an alternate, LHR proposes that this 100-foot space may be accomplished by irrigated agriculture or orchard. An area of 50 feet nearest structures (Zone A) will be clear of all non-fire-resistant vegetation and irrigated. An additional non-irrigated area outside of Zone A will have a 50% reduction in native fuels, with removal of dead and downed material, and will be known as Zone B. Trees in Zone B would be</td>
<td>This comment accurately describes the FPP’s proposed defensible space. However, since the time of the FPP’s approval, basic fire code changes now require 20 feet of roadside FMZ, which will be accommodated on-site and along designated off-site roadways.</td>
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<td>57</td>
<td><strong>Fire Protection Exceptions</strong></td>
<td>This comment accurately describes the proposed FMZ as detailed in the Projects Fire Protection Plan. However, since the FPP’s approval, the Project hasbolstered its FMZ approach and no longer relies on off-site agricultural areas for a portion of the thinning zone. These off-site agricultural land uses will still occur off-site, benefitting the Project with essentially an extended FMZ, but the Project will provide a minimum of 100 feet of perimeter FMZ (and up to 150 feet) for all structures, along with heat deflecting walls in addition to the 100-feet in select areas. Therefore, there are no areas that would receive less than 100 feet of FMZ.</td>
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<td>Exceptions to the 100-foot fuel modification zone have been proposed for the northeast and southwest corners of the property. The project has, over the course of negotiations, modified some exceptions and agreed to 100 feet clearance around the entire development. However, this offer has been made and rescinded several times and the current status of this proposal is unknown. Additionally, ember trapping attic vent installation had been proposed for structures adjacent to the heavy fuel beds and later modified to include the entire project. Similar to fuels management, this proposal has been made and rescinded over the course of negotiations between the County and the proponent. The project’s Fire Protection Plan does not detail the specific location of any sites where compromises to fuel modification or building construction methods may occur, other than to state “a few areas” may have reduced fuel modification width or “use alternate means and methods such as ember resistant walls”. The lack of final commitment to these strategies by the project, or substantive detail concerning the application of such exemptions has provided insufficient information from which to determine the adequacy or sufficiency of such treatments. It is recommended that the project be required to provide a final list of proposed exceptions and locations so that these may be adequately evaluated for mitigation of fire and life safety concerns.</td>
<td>The Project’s Wildfire Safety Compendium includes the complete list of fire safety and evacuation measures that are proposed as Project Conditions of Approval.</td>
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<td>58</td>
<td>Given the nature of old-age class fuel beds adjacent to portions of the property, fuel modification width may need to be increased overall to</td>
<td>The comment is noted and is consistent with the LHR Wildfire Safety Compendium’s summary of features, including FMZ,</td>
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<td>59</td>
<td>Implications for Fire Operations</td>
<td>The comment’s stated opinions on structural defense and evacuation are noted. The assessment is consistent with any new, master planned community in San Diego County’s WUI areas, including those that have been approved over the last 5 years or more.</td>
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<td>Structural wildfire defense and evacuation of the LHR Community will be a dynamic and a significant challenge for emergency services, but typical of challenges faced by many modern communities of San Diego County. Community fire resistive features including building construction, fuel modification, fire sprinklers and water systems, and related improvements will significantly reduce the potential risk to both civilians and public safety responders. In many respects, developed areas of the community, especially in the community center away from development perimeters, should be safer for people than surrounding roads or wildlands during fire movement.</td>
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<td>Among perimeter streets and homes, active firefighting structural defense will be necessary. Where adequate defensible space is provided and maintained, the chief risk will be from flame impingement from adjacent burning houses in close proximity, or from flying embers and spot fires developing among old fuel beds and ornamental vegetation. Left unchecked, these can contribute to significant structural loss. The chief</td>
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Estimated Potential Worst-Case Loss

Worst case wildfire conditions include severe Santa Ana winds, critical fire weather and extreme fire behavior. The estimated total structure loss from a short notice, worst case wildfire condition, based upon loss experience during the 2007 Witch and Guajito Fires (Maranghides & Mell, 2009), and 2014 Poinsettia Fire (San Diego Co. OES, 2014) in similar modern San Diego County communities built to Building Code Chapter 7A standards, could range from 2-7%. Structural loss would likely be concentrated on the community perimeters due to fire intensity, proximity to heavy fuels, or firebrands, and among a limited number of homes in the community interior presenting spot fire targets due to over-developed ornamental vegetation, yard storage conditions, and related factors. Once structures become involved, extension of fire to surrounding and exposed structures often results in a group loss in this community type, due to structural density.

In this worst-case scenario, fire resources may not achieve desired deployment levels due to reflex time from receipt of alarm to the time fire approaches structures, or due to regional resource drawdowns due to multiple fires. Lesser fire conditions or availability of adequate emergency mass resources will greatly alleviate worst case potential loss, especially where defensible space is widest.

Potential structure loss calculation assumes that all fire and building codes are met, fuel modification, and effective/approved alternate methods are in place.
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|   | Potential Structural Loss to CA Building Code Chapter 7A compliant structures: Total number of homes = 1,746  
Total number of perimeter homes: Approximately 200  
Loss of 7% of perimeter homes (worst case fire condition) = 14 Loss of 2% of perimeter homes (worst case fire condition) = 4  
* Homes on the northwest, west, and south west flanks of the development will be at highest risk due to adjacent heavy fuels | last several years, they are assessed against fire codes, standards, policies, regulations and best practices. When determined to at least meet these requirements, they are determined to be acceptable for approval and would not impact the ability of the fire authority having jurisdiction to provide protection and response.  
It is not possible to conclude from the photograph of the burning “modern” residence, from “2007”, why it ignited, but three observations are relevant:  
1. Codes have become even more restrictive since 2007, which represents four code cycle updates;  
2. The Lilac Hills Ranch homes will include the latest requirements and exceed these requirements via several Project design features  
3. This appears to include an attic fire, possibly indicating that its vents were not appropriately protected. LHR would include ember resistant vents for all structures. |

![Modern, fire resistive home burning during the Witch Fire, Rancho Bernardo, CA 2007](image)

<p>|   | Study Summary and Recommendations | The comment is noted and is consistent with the fire safety assessments conducted as part of the Project’s EIR. The recommendations provided are also consistent with the |</p>
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| 62 | **Wildfire Risk**  
1. Significant wildfire risk exists for the LHR planned community, especially from exposure to heavy, old-age fuels on the northwest, west, and southwest sides of the project. According to fire behavior studies, additional risk from large fire ember cast exists from fuels 1.5 - 2 miles from the project site, especially from fires traveling in Keys Canyon.  

**Recommendation:** The entire project is subject to long-range ember cast as disclosed by both the LHR proponent’s and this report’s fire behavior studies. All structures within the LHR community should be hardened against such risks, including fitting of ember capturing/fire resistive roof vents, building with fire safe construction materials, limitation of landscaping and yard structures for fire resistiveness, or similar conditions at the Fire Marshal’s discretion. | The comment requests additional details on proposed exceptions to the 100 foot wide FMZ. There are no exceptions proposed, and this comment seems to be based on an FPP that has since been superseded by an FMZ program that provides between 100 feet and 150 feet of FMZ adjacent to all perimeter homes. The areas called out in the western/southwestern portions of the Project would receive 150 feet of FMZ and all structures on site would include the enhanced ignition resistant vents and Chapter 7A requirements. This comment is based largely on a lack of the latest Project information being provided to Rohde and Associates prior to their Project review. Please refer to the Wildfire Safety Compendium for FMZ details. |
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<td>risks for specific lots. It is important to note that while attic vents are a deterrent from fire spread from ember cast, they do not mitigate all forms of heat transfer possible from inadequate fuel modification. Therefore, attic vents alone may not suffice in protecting a home from fire where the defensible space is reduced below County standards.</td>
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<td>Other alternate mitigations such as construction of ember resistant fire walls, structural lot setbacks, or other means may be considered and evaluated by the County Fire Marshall where appropriate and sufficient in reducing risk. However, the LHR project should identify where specific compromises are located, specify risks present at those sites, and propose effective mitigations.</td>
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<td>In our assessment, fuel modification distances may require increased depth from 100 feet to 150 feet to prevent fire and ember exposure where the project is proximal to old-age class fuel beds on the project’s northwest, west, and southwest aspects to provide effective separation of homes from this risk, as detailed earlier in this report.</td>
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<td>3. Inadequate information is presented in the proponent’s Fire Protection Plan to determine how alternate means and methods might be applied to the project to reduce fire risk. While construction features including ember resistant walls and fire resistive attic venting have been named as potential alternate compliance means in the Fire Protection Plan, no specific application or site is identified for applied use. Additional detail, mapping, and explanation is needed from the LHR project proponent to understand any identified risk, its siting, any departures proposed in fire or building code compliance, and proposed mitigations before a determination be made by the Fire Marshal that application of alternate means would be effective or successful.</td>
<td>Per the Wildfire Safety Compendium, all perimeter FMZs will be between 100 and 150 feet in width, and some will benefit from adjacent on-site agriculture, where the actual modified fuel areas will well-exceed 150 feet. No exceptions.</td>
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<td><strong>Recommendation:</strong> The LHR project’s Fire Protection Plan should be updated to identify specific sites where fire or building code may not be met by standard means and describe site specific alternate mitigations for achieving required protection. In the absence of this information, the Fire Marshal likely has insufficient data to make a conclusive finding or acceptance of alternate means.</td>
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<td>4. The project proposes construction per California Building Code Chapter 7A, Wildland- Urban Interface requirements, and proposes to sprinkler all structures. This is appropriate given the building site’s wildfire risk.</td>
<td>The comment is noted and raises no issues with the Project’s analysis or conclusions.</td>
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<td><strong>Recommendation:</strong> This is an appropriate measure for fire risk mitigation given the Wildland- Urban Interface nature of the LHR project site.</td>
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<td>5. This study has identified significant wildfire history of importance to the project that was not previously identified. Both this study and the project proponent’s Fire Protection Plan assessed that the site is subject to critical fire weather and burning conditions, extreme fire behavior, long range spotting, critically rapid rates of spread, and large wildfires. Both studies confirmed offshore and onshore wind driven fire trajectory concerns and potential paths of fire spread into the LHR planned community.</td>
<td>The Project’s FPP and related fire behavior and fire history analysis has already contemplated the potential for an extreme fire weather event. As indicated in the Rohde and Associates study, the fire behavior modeling provided in the Project’s FPP is consistent with Rohde’s modeling results. Because the Project has already considered an extreme fire event, it was planned and designed to withstand the type of fire that may occur in its vicinity. Further, the Project has gone beyond protecting its own residents by proposing numerous off-site improvements and ongoing funding for maintenance, resulting in a reduced fire hazard for the area. This comment raises no new issues that haven’t already been analyzed and incorporated into the Project’s fire safety approach.</td>
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<td>construction, fuel modification, evacuations, and temporary safe refuge planning.</td>
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<td><strong>6. Fire Services within the Deer Springs Fire Protection District appear to have the capacity to meet the call loads and emergency demands of the project. New timed response studies are needed, however, given recent LHR proponent proposals regarding community gating that require finalization. Specific concerns exist for the impact to response times presented by numerous emergency- access only gating. A project proposal has been offered to remove gates but has not been formalized with written or substantiated proposals. The use of gates as originally proposed affects both backup response from area fire stations for structure fire and medical response, as well as evacuations. Similarly, discussions continue related to new fire station construction and staffing. These proposals need to be finalized to allow final response studies and a determination by the Fire Marshal for adequacy.</strong></td>
<td>The comment relies on dated material regarding response times and gates. The response times were modeled using sophisticated GIS modeling software and included a delay for gates that were proposed at the time, but that have since been removed from consideration. Even with the gates, the response times from the Miller Station location and from the on-site location both meet the County’s 5 minute travel time. Without the gates, which have been removed from the Project’s plan except for one gate that would be manned 24/7, the response times improve and are even lower than the already sub-5 minute timeframes. Therefore, the comment is based on outdated information that has been superseded by submitted documentation addressing the comment’s concerns. <strong>Recommendation:</strong> The LHR project proponent and County need to finalize negotiations regarding fire station construction, staffing, and placement, and gate/street access for the project. Response time studies that have been completed cannot be counted upon for accuracy in the absence of these decisions. There also remains concern for the impact of gating to response times both for primary and secondary fire apparatus response. It is recommended that once negotiations are</td>
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| 67 | 7. Development of ungated community access via Mountain Ridge Road to the greater LHR community is critical for emergency response coverage and evacuation, and such access needs to be secured. Currently, the route is accessing a proposed assisted living facility only, with emergency gating between this use and the greater LHR community. This design compromises emergency response times to this high-call load facility from the closest fire station, as well as compromises emergency and evacuation access for the greater community. The LHR project may not comply with response time standards without this critical access/egress route.  

**Recommendation:** The LHR project needs to secure ungated road access to this route and recalculate evacuation and response time studies based upon this access.                                                                 | Please refer to response to comment 53 for more information regarding the Mountain Ridge gate. Mountain Ridge is a critical component of the Project’s road circulation system. The gate along Mountain Ridge Road would not be an emergency gate, it would be a manned 24/7 access gate, eliminating concerns that it may not be operable or could cause response delays. Even with the gate, response travel times were modeled to be under 5 minutes to all of Phase 5 where the assisted living facility would be located. The comment raises a concern that has been addressed in recent submittals and therefore, the recommendation to recalculate response time studies is not supported. |
| 68 | **Evacuation and Temporary Safe Refuge**  

8. The project proposes one main entrance located off West Lilac Road on the northern edge of the project. Additional street access has been proposed but not solidified by the project, and the question of road gating remains outstanding. The current limitation on road access likely does not meet Code required response time or access requirements  

**Recommendation:** Secure 24/7 public access to additional roads leading into the LHR Development site and remove all emergency gating to ensure emergency response access and unobstructed evacuation egress. | Please refer to response to comment 67.                                                                                                                                                                                                                                                                                                                                                                                     |
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<td>9. Evacuation routes identified by the proponent were significantly challenged by the findings of this study. All developer identified alternate, contingency, and emergency routes were found to be inadequate, and under certain circumstances even dangerous. Primary access routes were also determined to have significant issues of potential entrapment during evacuation. Additional road improvements outside of the immediate project area are likely needed to ensure safe evacuation. <strong>Recommendation:</strong> Eliminate consideration of all routes for evacuation except for those with primary road characteristics of guaranteed, non-gated public access. These roads include West Lilac Road and Circle R Drive. Consider improvements on West Lilac Road and Nelson Way to Old Highway 395 to accommodate public daily access and for use as a primary evacuation route. Increase road capacity to meet increased traffic demand, do not reduce existing road capacity for large vehicle and fire apparatus movement. Consider improvement of Nelson Way as an alternate evacuation route.</td>
<td>The comment raises concerns regarding evacuation on existing roads in the Project’s vicinity. The comment’s analysis does not take into consideration the off-site road improvements, modernization and increased vehicle capacity and optionality provided by the Project. The Project’s evacuation modeling focuses only on roads with primary road characteristics and does consider removal of gates and the modernization of Nelson Way as an alternate evacuation route. The Wildfire Safety Compendium details the road improvements while the evacuation plans prepared by Dudek outline the increased capacity and optionality provided by the planned improvements. These improvements are offered as Project Conditions of Approval.</td>
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<td>10. Areas of temporary safe refuge within the community were identified in the LHR Fire Protection plan, however no actual size or capacity of church or community center facilities were identified, therefore a conclusion could not be reached as to capacity for temporary safe refuge use by these facilities. Given evacuation routing concerns, and risks along evacuation routes, temporary safe refuge becomes a critical issue for the LHR development. <strong>Recommendation:</strong> The LHR proponent should provide greater detail as to the location, size, and construction features of the proposed temporary safe refuge facilities so that they can be assessed by the County Fire Marshall for meeting this need. Temporary safe refuge capacity should exist for community residents within the community to provide refuge of</td>
<td>The comment indicates a lack of details for temporary safe refuge areas. However, as indicated in previous responses to comments herein, the Wildfire Safety Compendium includes the requested details, but appears to have not been included in the Rohde and Associates materials for review. The comment’s raised issues are not valid as the information requested has been provided and the related analysis completed, resulting in a robust on-site temporary refuge capability that is unprecedented in San Diego County.</td>
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| 71 | 11. This study has identified a likely 1.5-hour timeframe for LHR community evacuation and recommended management action points for evacuation initiation. However, this does not reconcile with traffic studies or road capacity improvements proposed by the project.  

**Recommendation:** The LHR project proponent should propose road improvements that will ensure evacuation of the proposed development without degradation of the existing road capacity for regional evacuation. Traffic studies should be conducted for any route considered as essential for community evacuation, including Nelson Way. | The comment is in conflict with Dudek’s evacuation travel time analysis presented in two memoranda, one dated December 6 and one dated December 9. The two memoranda represent separate approaches to modeling evacuation travel times. The first is consistent with the analysis provided for recently approved San Diego County projects and indicates an evacuation travel time of less than one hour. The second is a modeling program that also indicates evacuation travel times of less than one hour. These results are consistent with the FEMA sourced 1.5 hour timeframe which was generally applied to LHR by Rohde and Associates. When a typical buffer of 30 minutes is added to the calculated travel times, the result is a very similar, roughly 1.5 hour evacuation timeframe. Therefore, it is concluded that the proposed improvements provide the evacuation results that the comment recommends and no additional analysis would be required. |
| 72 | 12. This study has identified a need for the project proponent to further define how elder and non-ambulatory populations may either be evacuated or protected in place as part of the community evacuation plan.  

**Recommendation:** The LHR project proponent should indicate how non-ambulatory populations can be adequately sheltered-in-place, and/or develop a contingency for evacuating this population successfully. This reference needs not only in the proposed Assisted Living Facility, but for the greater community as well. It is important to note that adequate time and logistics to fully evacuate non-ambulatory populations from such a facility in this community during extreme fire conditions is unfeasible and inherently dangerous. | Please refer to response to comment 44 for response to this repeated comment. |
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| 73 | 13. The use of traffic circles on West Lilac Road, a main evacuation route, has been proposed by the LHR project. Additional traffic studies are needed to show the impact such infrastructure would provide to large truck or horse trailer traffic, especially during an evacuation. The overall safety of a proposed “contingency traffic lane” in the road median needs to be outlined for how it would be marked or improved to allow emergency use and maintain traffic safety.  

**Recommendations:** Traffic intersections must be wide enough to manage large freight trucks, large horse trailer, and emergency vehicle traffic on a daily basis and provide for unobstructed travel during emergency evacuation. Any roundabout (traffic circle) should not include a physical central concrete barrier that could impede large vehicles from moving through it. Any central island to direct traffic slow through the roundabout should be merely painted on the pavement. Additional traffic studies are needed and must confirm the ability of the proposed infrastructure to accommodate such traffic. | The Wildfire Safety Compendium addresses this comment in terms of the roundabout dimensions and painted aprons, medians and shoulders. The roundabout details indicated in the Dudek memorandum (Dec 9, 2019) illustrate that the roundabouts would not cause issues with large vehicles or horse trailer traffic. The requested details have been provided and fully address the comment’s questions and concerns. Therefore, the comment requires no additional analysis. |
| 74 | 14. The traffic study by Fehr and Peers and Dudek (2019) includes assumptions for contraflow which are likely unreasonable for a large wildfire occurring in this region. Traffic management assumptions likely exceed law enforcement capacity for implementation given competing wildfire priorities and duties, and the large area of traffic management involved. Importantly, proposed contra-flow and reduced lane widths could be severely detrimental to emergency vehicle access.  

**Recommendations:** The use of contraflow as an evacuation method should be eliminated from consideration by the project. Use of traffic roundabouts should be of sufficient size to guarantee large truck and emergency vehicle access. Roadways should be of sufficient | Contraflow is not recommended by the Project’s evacuation plan. The roads that include additional capacity, namely West Lilac Road and Circle R Drive, would include an additional lane so that two lanes could be dedicated to evacuation traffic while still leaving an inbound lane for emergency responders. Any earlier reference to contraflow was used as an example of how to increase capacity short of making road improvements. However, per the Wildfire Safety Compendium, these roads would be improved and restriped to include the middle turn lane that would then be used for evacuation during a large evacuation event. Please refer to the December 2019 Dudek memoranda for details. Please refer to response to comment 73 regarding the roundabout details and their ability to move large truck and emergency vehicle access. |
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<td>size and design to allow for emergency vehicle access under evacuation conditions.</td>
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ATTACHMENT 6

LHR PROPOSED CONDITION OF APPROVAL
EIR RECIRCULATION STANDARDS ARE NOT TRIGGERED

Village Communities, LLC, the landowner/applicant of the proposed Lilac Hills Ranch planned community (Project) situated in San Diego County, completed its Final Environmental Impact Report (EIR) submittal to the County of San Diego (County), Planning & Development Services, in December 2019. The Lilac Hills Ranch Final EIR submittal can be found at: https://www.dropbox.com/sh/ycooodr62h1u85z/AAC3wnZfdFjzLw17CRP0HDr0a?dl=0.

This white paper has been prepared to summarize the substantial evidence in the County’s record confirming that the Lilac Hills Ranch Final EIR need not be recirculated because the EIR recirculation standards under the California Environmental Quality Act (CEQA) have not been triggered.

Background

As shown below, the Lilac Hills Ranch EIR has been circulated for public review and comment three times (in 2013, 2014, and 2018), and a draft final EIR previously was released and posted for public review (in 2015). The Lilac Hills Ranch Final EIR (2019) represents the culmination of the environmental analysis completed for the Project in full compliance with CEQA and the CEQA Guidelines and does not trigger recirculation. The pertinent factual chronology is presented below.

Project History and CEQA Analysis

2012 Notice of Preparation of EIR

In May 2012, the Notice of Preparation (NOP) of a draft EIR was distributed for a 30-day review period. The County held a related EIR scoping meeting in July 2012. The NOP comments are included in the Appendices A and B to the 2013 Draft EIR (discussed below), and the environmental issues raised in NOP comments are also evaluated throughout the EIR.

2013 Draft EIR

In July 2013, the Lilac Hills Ranch Draft EIR (2013 DEIR; SCH No. 2012061100) was first made available to the public and all interested public agencies for a 45-day comment period starting July 3 and ending August 19, 2013.

2014 Revised Draft EIR

In 2014, the County directed preparation of the Lilac Hills Ranch Draft Revised EIR (2014 RDEIR). The 2014 RDEIR was made available for review to the public and all interested public agencies starting July 12 and ending July 28, 2014.
2015 Draft Final EIR

In 2015, the County required completion of the Lilac Hills Ranch Draft Final EIR (2015 Draft Final EIR), which included written responses to public/agency comments, clarifications to the EIR, and minor modifications to the Project. The 2015 Draft Final EIR was made available on the County’s website to facilitate additional public review and agency consultation.

The Project and the 2015 Draft Final EIR were presented to the County’s Planning Commission at three public hearings held on August 7, August 12, and September 11, 2015. On September 11, 2015, at the recommendation of the County Department of Planning & Development Services, the Planning Commission voted to recommend approval of the EIR and Project to the Board of Supervisors with modifications and conditions.

2018 Second Partial Draft Revised EIR

In 2017 through 2018, and after the 2016 Project voter initiative and an election, the Project applicant: (a) modified the Project to include all of the Planning Commission and staff recommendations issued in 2015; (b) revised the Project’s GHG analysis to address the California Supreme Court’s November 2015 decision in Center for Biological Diversity v. California Department of Fish and Wildlife (2015) 62 Cal.4th 204; (c) revised the Project’s traffic analysis due to updated traffic counts; (d) updated GHG, air quality, and noise technical analyses to address changes to the traffic analysis; and (e) revised the Project’s Specific Plan to reflect Project modifications (2018 Specific Plan, with Appendix J to the Specific Plan summarizing the Project modifications).

In 2018, the County required the completion and recirculation of the Second Partial Draft Revised EIR (2018 DREIR) for another 45-day comment period, starting February 22 and ending April 9, 2018. The 2018 DREIR included: (a) updated EIR sections, specifically traffic and GHG; and (b) updated GHG, air quality, traffic, and noise technical analyses. The 2018 DREIR included a “Recirculation Reader’s Guide” explaining the County’s decision for recirculation. At the same time, the County required the 2018 Specific Plan to be made available for review, along with Appendix J to the Specific Plan.

Thus, the 2013 DEIR, the 2014 RDEIR, the 2015 Draft Final EIR, and the 2018 DREIR have been the subject of exhaustive public review and agency consultation.

Planning Commission “Substantial Modifications” Review and Decision

On June 8, 2018, the County Planning Commission considered whether the 2018 Project changes were “substantial modifications” under Government Code section 65356. If the Planning Commission determined that the 2018 Project changes constituted “substantial modifications” not previously considered by the Commission during its prior hearings, the Project would be required to obtain a new Commission recommendation. If, on the other hand, the Planning Commission determined that the Project changes were not substantial, the Commission would
not be required to review further, nor make a new recommendation; and, instead, the 2018 Project could proceed directly to the Board of Supervisors for final action.

After the June 2018 public hearing, the Planning Commission decided that the 2018 Project changes did not constitute “substantial modifications,” allowing the 2018 Project and EIR to proceed directly to the Board of Supervisors.

2019 Final EIR for the Lilac Hills Ranch Project

As described above, the 2019 Final EIR is the culmination of the environmental analyses completed pursuant to CEQA for the Lilac Hills Ranch Project. The Final EIR is comprised of the 2013 DEIR, the 2014 DREIR, the 2015 Draft Final EIR, and the 2018 DREIR.

In addition, the 2019 Final EIR encompasses Project refinements, clarifications, and minor modifications to: (a) clarify or amplify information already presented in the draft EIRs; (b) respond to public/agency comments, which is a recognized part of the CEQA process; (c) further reduce identified environmental effects without changing any significance thresholds or significance findings; (d) refine or clarify the timing and locational requirements of existing mitigation measures; (e) enhance fire safety with additional design features and/or conditions; (f) update regulatory requirements; (g) describe the Project changes to the design as recommended by the Planning Commission and/or County staff, all of which were already part of the recirculated 2018 DREIR; and (h) disclose other minor changes made in the multiple iterations of the draft EIRs that were subjected to recirculation in the 2014 DREIR and the 2018 DREIR.

Project refinements are addressed in Final EIR Chapter 1.0., Project Description, as well as Chapter 8.0, and shown by using numerous mechanisms to facilitate Final EIR review by the public and all interested agencies. For example:

- The Final EIR’s “Reader’s Guide” explains the Project’s clarifications and minor modifications shown in the FEIR Chapters, FEIR appendices, and responses to comments.

- The Final EIR Chapters identify the EIR text changes. Specifically, the text changes are shown in a single strike-out/underline format to reflect the Project’s clarifications and minor modifications responsive to public and agency comments received during the public review period for the 2014 DREIR. The Final EIR Chapters identify the EIR text changes shown in a double strike-out/underline format to reflect: (a) the applicant’s acceptance of the 2015 Planning Commission recommendations; and (b) Project clarifications and minor modifications in response to both comments received during the public review period for the 2018 DREIR, and County staff comments to enhance fire safety.

- Appendices J and K to the 2018 Specific Plan summarize the Project’s clarifications and minor modifications responsive to County staff fire safety enhancements.
- Final EIR, Chapter 8.0 summarizes all Project clarifications and minor modifications (e.g., Table 8-1); provides lists of all agencies, organizations, and individuals that commented on the 2014 DREIR and the 2018 DREIR; and identifies the FEIR appendices.

Notably, the Lilac Hills Ranch Final EIR will be made available to the public and all commenting public agencies before the County’s Board of Supervisors considers whether to certify the Final EIR and approve the Project. More specifically, the County’s current practice is to post on the County’s website all Final EIRs, including responses to both public and agency comments, approximately 10 days to two weeks before certifying the final EIR.

The County’s practice is consistent with CEQA Guidelines section 15089(b), which provides that the lead agency may provide an opportunity for review of the final EIR by the public or by commenting agencies before approving the project. This practice also is consistent with CEQA requirement that lead agencies provide written proposed responses, either in printed or electronic format, to any public agency that commented on the draft EIR at least 10 days before certifying the Final EIR. (See Pub. Resources Code, § 21092.5; CEQA Guidelines, § 15088(b).) Indeed, the County’s current practice exceeds CEQA requirements by posting/releasing the Final EIR and all written proposed responses to both the public and all commenting public agencies.

**CEQA Findings**

The proposed Lilac Hills Ranch Project CEQA and Environmental Findings (CEQA Findings) summarize the findings, reasoning, and decision that no “significant new information,” as defined by CEQA Guidelines section 15088.5(a), has been added that would require recirculation of the information presented in the Final EIR.

Specifically, while the CEQA Findings acknowledge that new information has been added to the Final EIR, the new information serves only to clarify or amplify or make minor modifications to an otherwise adequate EIR by improving the Project design, protecting the environment, enhancing fire safety, and minimizing identified environmental impacts. Accordingly, such information is not “significant new information” — as that term is defined in CEQA Guidelines section 15088.5(a)(1)-(4). The CEQA Findings also identify the substantial evidence in the record that supports the recirculation decision (see CEQA Findings, Part IV).

**Analysis**

As stated, the 2019 Final EIR submittal includes, but is not limited to: (a) the Reader’s Guide; (b) Final EIR Chapter 8.0 (including Table 8-1); (c) Appendices J and K to the 2018 Specific Plan; and (d) the Board’s proposed CEQA Findings — all of which explain the changes made between the recirculated 2014 and 2018 RDEIRs and the 2019 Final EIR. The identified changes shown in the 2019 Final EIR do not trigger yet another round of public review because the changes do not constitute “significant new information,” as that term is defined under CEQA. As explained below, the “significant new information” requirement is intended to reaffirm the goal
of meaningful public participation in the CEQA review process, “but without promoting endless rounds of revision and recirculation.” (Laurel Heights Improvement Assn. v. Regents of Univ. of Cal. (1993) 6 Cal.4th 1112, 1132 (recirculation “is intended to be the exception, rather than the general rule”).)

**CEQA Recirculation Standards**

CEQA requires the County, as lead agency, to recirculate an EIR when “significant new information” is added to the EIR after public review, but before considering certification. (Pub. Resources Code, § 21092.1; CEQA Guidelines, § 15088.5(a).) “Recirculation means making the revised EIR available for public review and consulting with … other agencies again before certifying the EIR.” (Citizens for Positive Growth & Preservation v. City of Sacramento (2019) 43 Cal.App.5th 609, 631; CEQA Guidelines, § 15088.5(d).) Section 15088.5(a) defines the terms “information,” “significant,” and “significant new information” in the context of a lead agency’s recirculation decision.

“Information” can “include changes in the project or environmental setting as well as additional data or other information.” (CEQA Guidelines, § 15088.5(a).) Notably, “[n]ew information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” (Id., emphasis added.)

Accordingly, information can be added to an EIR after public review, but before certification provided the information is not “significant.” Critically, the only information that qualifies as “significant” is: (i) information added to an EIR that gives rise to a “substantial adverse environmental effect” or (ii) information that identifies “ways to mitigate or avoid such adverse environmental effects” that the project proponent “declines” to implement.

Here, the 2019 Final EIR contains new information, but that information does not identify or give rise to any new or more severe adverse environmental effects of the Project than previously disclosed in the 2014 and 2018 RDEIRs; and it does not propose any feasible mitigation or alternatives that the Project applicant has “declined to implement.”

Further, the 2019 Final EIR does not include any “significant new information,” as that term is defined in CEQA. Pursuant to CEQA Guidelines section 15088.5(a):

“‘Significant new information’ requiring recirculation include, for example, a disclosure showing that:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.” (Id., and see Pub. Resources Code, § 21092.1.)

Section 15088.5(b) provides that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” Again, recirculation is not required simply because new information is added to an EIR. Indeed, the Final EIR “will almost always contain information not included in the draft EIR given the CEQA statutory requirements of circulation of the draft EIR, public comment, and responses to ... comments prior to certification of the final EIR.” (South County Citizens for Smart Growth v. County of Nevada (2013) 221 Cal.App.4th 316, 328, citation omitted.) “[R]ecirculation was intended to be an exception, rather than the general rule.” (Id.)

Courts Defer to the Lead Agency’s Decision Not to Recirculate

The County’s decision not to recirculate the 2019 Final EIR would be “reviewed for substantial evidence, resolving reasonable doubts in favor of the administrative finding and decision.” (Citizens for Positive Growth & Preservation, supra, 43 Cal.App.5th at p. 632; CEQA Guidelines, § 15088.5(e).) A project opponent “bears the burden of proving” the record does not contain any substantial evidence to support the County’s decision not to recirculate an EIR. (Id.) Courts also “must defer to an agency’s explicit or implicit decision not to recirculate a draft EIR so long as it is supported by substantial evidence.” (San Francisco Baykeeper, Inc. v. California State Lands Comm’n (2015) 242 Cal.App.4th 202, 224.) Indeed, an agency’s decision not to recirculate an EIR “is given ‘substantial deference’ and is presumed ‘to be correct.’” (Ibid., citation omitted.)

CEQA Case Law Referenced by County Staff

Save Our Peninsula Committee v. Monterey County Bd. of Supervisors
(2001) 87 Cal.App.4th 99 (recirculation required)

In Save Our Peninsula, EIR recirculation was required because the draft EIR stated that any increased water pumping over baseline would have to be mitigated either by reducing the project’s residential density or by reducing pumping elsewhere within the local groundwater basin. However, the project applicants did not identify an off-site reduced water pumping location as mitigation until an “errata” was prepared “shortly” before the Board meeting. The
errata contained no environmental analysis of the adverse environmental effects of the pumping reduction on the off-site property, and no environmental analysis of the broader issues raised in comments regarding whether the mitigation: (i) was feasible, (ii) gave rise to adverse growth-inducing effects elsewhere in the basin, and (iii) was based on valid riparian water rights, and if such rights could even be used without a permit issued by the State Water Board. (Id. at pp. 128-135.)

In contrast, here, consistent with CEQA, the 2019 Final EIR: (a) includes the revised draft EIR pages shown in strike-out/underline text; (b) adds the comment letters received on the 2014 and 2018 DREIRs; (c) lists the commenting agencies and individuals on the 2014 and 2018 RDEIRs; and (d) adds the County’s written responses to the public/agency comments, including “Global Responses” addressing recurring comments received on the 2014 and 2018 DREIRs, and technical appendices supporting the Final EIR responses to comments. None of the Project’s modifications, clarifications, or added design features and/or conditions introduce any mitigation giving rise to unanalyzed environmental effects; change the EIR’s significance findings; or give rise to any new or more severe significant environmental effects. To the contrary, such changes or additions only serve to address public comments and/or reduce environmental effects.

Valiano – Elfin Forest Harmony Grove Town Council v. County of San Diego
(No. 37-2018-00043049-CU-TT-CTL; 2/20/20 Minute Order)
(recirculation required)

Valiano, a residential development project in the San Dieguito community of San Diego County, is the subject of a currently pending lawsuit in San Diego Superior Court filed by petitioners Elfin Forest Harmony Grove Town Council and other groups challenging the County’s approval of the project and related EIR, primarily on CEQA and General Plan deficiency grounds.

Petitioners in that trial court case asserted that the Final EIR should have been “recirculated.” They contended that the earlier revised draft EIR used the County’s 2020 “efficiency” significance threshold and found that the project’s GHG emissions were “below” that significance threshold; however, the later Final EIR used a “different” significance threshold (net zero GHG emissions) and, based on that different threshold, the Final EIR concluded new mitigation was required to achieve the threshold. The Court found that “[c]hanging the acceptable floor for GHG emissions is significant because it resulted in a new determination that mitigation was required. Given that the change was not insignificant, nor was it a clarification or
amplification of the threshold used in the Revised Draft EIR, the final EIR should have been recirculated.” (Minute Order, Feb. 20, 2020, pp. 3-4, emphasis added.)

Here, in sharp contrast, the County previously required the Lilac Hills Ranch Project to modify its GHG emissions analysis to achieve a net zero GHG emissions significance threshold, the applicant concurred, and the new GHG analysis was already included in the recirculated 2018 DREIR. Specifically, the 2018 DREIR included a new “Global Climate Change” analysis, supported by a new GHG technical analysis, and that new assessment replaced the previous 2014 RDEIR’s GHG technical analysis. The 2018 DREIR also included new environmental impacts associated with GHG emissions, which were mitigated to less-than-significant levels through the Project’s attainment of a net zero GHG emissions level; and the entire new analysis and new mitigation framework were recirculated for a 45-day period for public review and comment, as well as further agency consultation. (See also Final EIR CEQA Findings, p. 106.)

Since then, the Final EIR has been completed, including the County’s written responses to public/agency comments. In addition, in response to comments, the Final EIR included text changes to update GHG laws and regulations and clarify Project design features and mitigation; however, none of the clarifications change any significance thresholds or affect the effectiveness of the Project design features or mitigation. Further, all GHG “significant impact” findings remain less than significant with mitigation in the Final EIR, and the Final EIR does not result in any new significant environmental effects or increase the severity of any previously identified significant effect. For those reasons, the proposed CEQA Findings include the express finding that “no significant new information has been added that would trigger the need to recirculate the [Final] EIR” under CEQA. (CEQA Guidelines, § 15088.5(a)(1)-(4).)

Moreover, the Valiano trial court ruling is the subject of a pending appeal, and California courts have upheld agency decisions not to recirculate where changes to mitigation measures “do not increase environmental impacts, much less substantially increase them.” (Environmental Council of Sacramento v. County of Sacramento) (2020) 45 Cal.App.5th 1020, 1035.) In fact, recirculation is not required “unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project, or (2) a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” (CEQA Guidelines, §15088.5(a), emphasis added.) These considerations call into question the validity of the Valiano trial court ruling.

While this paper addresses the referenced Valiano decision, it has no precedential value because it is a trial court ruling only and not a published Court of Appeal case.
Soitec Solar Project – Backcountry Against Dumps, et al. v. San Diego County
(No. 37-2015-00007420-CU-WM-CTL; June 2015 Trial Court Ruling)
(recirculation required)

The Soitec solar farm development project, situated in southeastern San Diego County, was the subject of a lawsuit in San Diego Superior Court filed by petitioners Backcountry Against Dumps and Ms. Tisdale. The suit challenged the County’s approval of the Soitec project and related EIR, primarily on CEQA deficiency grounds.

Petitioners in the Soitec trial court case asserted that, after the close of the comment period on the Program EIR, the County adopted an alternative project (“alternative 2A”) that, among other things, included an “energy storage system” project component comprising 160 shipping containers, each holding multiple racks of lithium-ion batteries and fire suppression and detection equipment. Each shipping container was 40 feet long and 8.5 feet wide, with a height of 18 feet (after accounting for an integrated, roof-top heating, ventilation, and air conditioning system). The energy storage component covered 7 acres within the project’s development footprint, but each container needed to be sited on a level, graded, and prepared surface that was not re-vegetated. The Final Program EIR addressed this energy storage component of the alternative project, but it was not recirculated.

The trial court ruled that the Final Program EIR was deficient on recirculation grounds because the addition of the energy storage system was a “component” of the alternative project and “the project description omitted a significant component of the project such that the CEQA process was deficient.” (Minute Order, July 8, 2015, pp. 3-4.) In other words, the trial court determined the Draft Program EIR that was circulated for review failed to identify, include, and analyze the environmental effects of a significant component of the project; and that project component was then added to the Final Program EIR without any public review or agency consultation opportunity. For that reason, the trial court found that “the addition of the energy storage component to the project constitutes ‘significant new information’ such that recirculation is necessary.” (Id. p. 5.)

The trial court also pointed to “possible” noise and visual impacts that were not addressed due to the addition of the energy storage project component. (Id.) In addition, the trial court found the Final Program EIR “deficient” for not addressing the additional grading and site preparation work associated with the energy storage project component. (Id. at p. 11.) The trial court added that the Final EIR failed to discuss potential impacts associated with electromagnetic field emissions caused by the battery storage element of the energy storage project component. (Id. at p. 13.) Lastly, the trial court noted that the newly disclosed energy storage project

While this paper addresses the referenced Soitec decision, it has no precedential value because it is a trial court ruling only and not a published Court of Appeal case.
component’s battery storage element (i.e., 160 shipping containers with multiple racks of lithium-ion batteries) raised “additional” fire risk and ordered the fire risk analysis to be recirculated. (Id. at p. 14.)

The Soitec project stands in stark contrast to the Lilac Hills Ranch Project and Final EIR. No project component was omitted from the Lilac Hills Ranch Draft EIRs, and no project component was added to the Final EIR. Said differently, the EIR analyses for Lilac Hills Ranch described and analyzed all Project components; and four iterations of that EIR (i.e., 2013 DEIR, 2014 RDEIR, 2015 Draft Final EIR, and 2018 DREIR) have been made available for public/agency review, and the County has received and responded to public/agency comments on those EIRs. In short, Lilac Hills Ranch does not raise an “omitted” project component claim rendering the EIR analyses inadequate.

Other Published CEQA Cases Confirm Recirculation is not Required

Five other published Court of Appeal decisions arising under CEQA confirm that recirculation is not required for the Lilac Hills Ranch Final EIR.

As shown below, the South County decision confirms that the addition of a new alternative does not trigger recirculation; the Beverly Hills decision represents an example of how the addition of new technical studies in a final EIR that serve to confirm the conclusions in the draft EIR do not require recirculation; and the East Sacramento decision illustrates that corrections in road segment designations and level of service classifications do not require recirculation. Further, the San Franciscans decision shows that updated technical analyses indicating water shortfalls sooner than anticipated in the draft EIR did not require recirculation; and the Environmental Council decision provides that additional and new mitigation measures added to a final EIR that do not “increase” adverse environmental effects do not trigger recirculation.

South County Citizens for Smart Growth v. County of Nevada (2013) 221 Cal.App.4th 316 (recirculation not required)

In South County Citizens, after the final EIR had been circulated, the Planning Commission voted to recommend that the Nevada County Board approve a modified version of the project, called the “staff alternative,” to address concerns over the project’s air quality and traffic impacts. (Id. at p. 323.) Thereafter, however, the project applicant (KKP) submitted a second alternative addressing some of the Planning Commission’s concerns; the Planning Commission and staff recommended KKP’s second alternative as the revised project; and the Board ultimately approved the revised project. (Id. at p. 329.) The petitioner claimed that the Board should have prepared and recirculated a revised draft EIR with the new alternative.

The Court of Appeal held that when information added to a final EIR consists of a suggested new alternative (or mitigation), recirculation is required only if the
alternative/mitigation measure meet all of the following criteria: (i) it is feasible; (ii) it is considerably different from the mitigation measures already evaluated in the draft EIR; (iii) it would clearly lessen the project’s significant environmental impacts; and (iv) it is not adopted (i.e., the project applicant declines to adopt it). (Id. at p. 330.) The petitioner had the burden to demonstrate that there was no substantial evidence to support a finding on any of the four above-listed factors in order to establish the County abused its discretion in failing to recirculate the EIR. (Id. at p. 330.) The petitioner failed to meet its burden because it did not demonstrate that there was no substantial evidence to support a determination that the staff alternative was not considerably different than the other alternatives in the EIR. (Ibid.)

**Beverly Hills Unified Sch. Dist. v. Los Angeles County Metro. Transp. Auth.**  

In *Beverly Hills*, the Court of Appeal found that new fault and tunneling studies confirmed conclusions in the draft EIR and held that the final EIR was not changed in a manner that deprived the public of an opportunity to comment on significant adverse environmental impacts. (Id. at p. 663.) The petitioners also asserted that the final EIR reported significant new air quality impacts not recognized in the draft EIR; however, the Court of Appeal held that the air quality addendum adopted by the Transportation Authority as part of the Final EIR did not change the air quality conclusions reached in the draft EIR, but instead added more detail about construction timing and impacts and those changes did not require recirculation.

**East Sacramento Partnerships for a Livable City v. City of Sacramento**  
(2016) 5 Cal.App.5th 281 (recirculation not required)

In *East Sacramento Partnerships*, the petitioner argued the city was required to recirculate because the final EIR identified a new roadway segment impact. Specifically, the draft EIR identified a roadway segment as a “major collector” road operating at LOS A under existing and existing-plus-project conditions and LOS B under cumulative-plus-project conditions. However, in the final EIR, the road designation was corrected from a “major collector” to a “local” road. Under the “local road” designation, the road segment currently operated at LOS D and at LOS E with the project, and at LOS F under cumulative-plus-project conditions. (Id. at p. 298.)

The Court of Appeal held that the change in LOS designation due to the correction of the roadway segment’s designation did not require recirculation. There was no change in the *amount of traffic* on the roadway segment between the draft and final EIR. The impact was not new, only the designation and corresponding LOS classification. (Ibid.)

**San Franciscans for Livable Neighborhoods v. City & County of San Francisco**  
(2018) 26 Cal.App.5th 596 (recirculation not required)

This case involved an EIR for a general plan housing element. The EIR was based on a 2009 water supply availability study (WSAS), which calculated water demand projections for the
city. After publication of the final EIR, but prior to certification, the WSAS was updated, indicating that the possible water deficit anticipated after 2030 could come about sooner (between 2013 and 2018) due to a decreased amount of water available from three creeks. (Id. at p. 629.)

The Court of Appeal upheld the city’s decision not to recirculate the EIR. The Court noted that the EIR and WSAS already acknowledged that supply might not meet demand after 2030; the EIR also identified options to address the shortfall, specifically rationing, which had been determined not to have significant environmental impacts. The final EIR comprehensively addressed the new information and noted that, even if the supply could not meet demand prior to 2030, slightly increased rationing would be instituted. As a result, the Court held that the petitioner’s disagreement with the final EIR’s analysis was insufficient to establish that the city abused its discretion in determining that recirculation was not required. (Id. at p. 631.)

*Environmental Council of Sacramento v. County of Sacramento* (2020) 45 Cal.App.5th 1020 (recirculation not required)

The County of Sacramento approved Cordova Hills, a large master planned community comprised of residential and commercial uses and a university. The project is located on approximately 2,669 acres in southeastern Sacramento County, and currently the site is used for grazing cattle. (Id. at p. 1025.) The EIR found the Project will cause significant and unavoidable impacts to air quality by increasing NO\textsubscript{X} and ROG emissions beyond air quality management district’s threshold of significance of 65 pounds per day. (Id. at p. 1033.) At the time the EIR was certified, the air district proposed *additional* mitigation measures to reach a 35% reduction in emissions and the County subsequently adopted changes to mitigation measure AQ-2 in accepting the air district’s proposed changes. (Id. at p. 1032.)

The Court of Appeal rejected arguments that the County was required to recirculate the EIR to address the revisions to mitigation measure AQ-2. The Court held that revisions to the mitigation measure “do not increase environmental impacts, much less substantially increase them.” (Id. at p. 1035.) The Court also observed that even accepting as true petitioner’s argument that the mitigation could potentially only reduce the project’s NO\textsubscript{X} and ROG emissions by 20% as opposed to 35%, the “difference in reduction of mitigation is not significant new information requiring recirculation.” (Ibid.) As a result, changes to the mitigation measure did not require recirculation.

**Conclusion**

The Final EIR for the Lilac Hills Ranch Project need not be recirculated.

To date, four iterations of the EIR have been made available for review by the public and all interested public agencies. The Final EIR includes numerous mechanisms, including a Reader’s Guide, to facilitate further review of the Final EIR by interested members of the public.
and agencies in advance of the County Board of Supervisors’ consideration of the Project. Additionally, Project changes are described in several areas of the Final EIR, including FEIR Chapter 8.0 and Table 8-1, and Appendices J and K to the 2018 Specific Plan.

New information has been added to the Final EIR, but that information is not “significant new information” for purposes of CEQA’s recirculation standards because it serves only to: (a) clarify or amplify information already presented in the draft EIRs; (b) respond to public/agency comments, which is a recognized part of the CEQA process; (c) further reduce identified environmental effects without changing any significance thresholds or significance findings; (d) refine or clarify the timing and locational requirements of existing mitigation measures; (e) enhance fire safety with additional design features and/or conditions; (f) update regulatory requirements; (g) describe the Project changes to the design as recommended by the Planning Commission and/or County staff, all of which were already part of the recirculated 2018 DREIR; and (h) disclose other minor changes that were subjected to recirculation in the 2014 DREIR and the 2018 DREIR.

Lastly, and consistent with the County’s current practices, the Lilac Hills Ranch Final EIR will be released/posted on the County’s Project website for public and agency review at least 10 days to two weeks before the Board of Supervisors considers whether to certify the Final EIR and approve the Project.
ATTACHMENT 7
LHR PROJECT CONDITIONS OF APPROVAL
REVISED LHR CONDITIONS OF APPROVAL 4 AND 9

The County of San Diego Planning Commission approved Lilac Hills Ranch (LHR) Tentative Map Conditions of Approval 4 and 9 have been combined, revised, and replaced by one clarified proposed map condition, titled “LHR 4 (Clarified).” The proposed condition is presented below.

LHR 4 (Clarified Condition)

Tentative Map Condition of Approval:

Background

Pursuant to County of San Diego (County) procedures, a Project applicant is required to obtain a completed and signed Project Facility Availability Form (DPLU Form-399F) from the “fire authority having jurisdiction” over a land use development project.

The Lilac Hills Ranch Project (Project) is located within the Deer Springs Fire Protection District (DSFPD or District), making DSFPD the fire authority having jurisdiction. Fire and emergency medical services would be provided by the DSFPD and/or the California Department of Forestry and Fire Protection (CAL FIRE). As required, the Project applicant obtained the completed and signed Project Facility Availability Form from the District Fire Chief; and in doing so, the DSFPD confirmed that the Project is eligible for fire service and that its fire protection facilities are currently adequate or will be adequate to serve the Project.

The DSFPD also imposed conditions on the Project. The first condition requires the Project to comply with the conditions set forth in the District’s four-page letter attached to the County’s completed Project Facility Availability Form. The second condition requires the Project to adhere to all Fire codes, Building codes, and County codes applicable at the time of Project commencement. The Project also has been conditioned to meet the County’s General Plan five-minute travel time by implementing one of four options listed in the August 7, 2015 Planning Commission Hearing Report. These District conditions are all part of the County Planning Commission’s conditions of approval for the Project.

In addition, the DSFPD has approved the Project’s Fire Protection Plan. The plan states the Project shall “provide fuel modification on either side of public roadways, pursuant to the County’s Consolidated Fire Code and the California Fire Code for clearance of brush and vegetative growth from roadways,” along with the mandatory requirement to “modify combustible vegetation in the area within 10 feet from each side of a road or driveway to establish a fuel modification zone on fire apparatus access roads and driveways.” (Italics added.) This Fire Protection Plan condition is applicable to offsite public roadways (as the Project has no public roadways within the Project site).

This condition, as implemented in full below, expands the approved Fire Protection Plan’s requirement to modify the combustible vegetation in the area from within 10 feet to within 20 feet,

1
and applies the clearing requirement to the offsite road designated below to enhance fire safety and promote orderly evacuation.

**Condition**

**Funding for Fuel Modification**

As a condition of tentative map approval, the Project applicant or its designee shall enhance public safety and promote orderly evacuation by providing the total sum of not to exceed two million dollars ($2,000,000.00) to the DSFPD in the manner described below, for the purpose of: (a) removing, clearing, and/or modifying combustible vegetation (Fuel Modification) in the offsite area within 20 feet from each side of West Lilac Road from Circle R Drive to Old Highway 395 and Circle R Drive from West Lilac Road to Old Highway 395 (Designated Route), as shown on Attachment A, Offsite Fuel Modification Zone; and (b) hardening existing offsite residences along the Designated Route (Attachment A), as described below.

- **Initial Fuel Modification Payment:** Upon issuance of the first residential certificate of occupancy within the Project, the Project applicant or designee shall pay the DSFPD the upfront sum of $266,600.00 for initial Fuel Modification (Initial Fuel Modification).

- **Annual Fuel Modification Payments:** Upon the first anniversary date of the issuance of the first residential certificate of occupancy within the Project and every year thereafter as shown on Table 1, the Project applicant or designee shall pay the DSFPD the annual sum of $78,910.00 for Fuel Modification (Annual Fuel Modification).

- **Additional Funding:** At each certificate of occupancy evenly divisible (e.g., 100th, 200th, 300th, etc.), the Project applicant or its designee shall pay to the DSFPD the additional sum of $57,273.00 (Additional Funding), to be used for Annual Fuel Modification as may be needed, and/or the hardening of offsite habitable structures along West Lilac Road (Attachment A) (Offsite Hardening). The Offsite Hardening shall include and not be limited to: (a) retrofitting/installing existing eave, roof, and foundation vents with approved ember-resistant vents; and/or (b) retrofitting/installing dual-paned/tempered replacement windows, approved fire-resistive siding, enclosed boxed eaves, and approved Class A rated roof covering. Existing property owners along West Lilac Road (Attachment A) will be invited to submit a written request to the DSFPD to participate in this Offsite Hardening program; and the DSFPD will direct the Project applicant or designee to implement said program on a first come, first serve basis and subject to the amounts identified herein.

The funding for the Initial Fuel Modification, the Annual Fuel Modification, and the Additional Funding shall be placed in a special reserve account as directed by DSFPD, the purpose of which shall be limited solely to implementing this condition, and such funds shall not be used for any other purpose.

The ongoing obligation to continue the offsite Annual Fuel Modification along the Designated Route (Attachment A) shall be implemented by the Project’s Homeowners’ Association (HOA)
at issuance of the 1,700th residential certificate of occupancy. To illustrate the payment breakdown, please see Table 1.

The Project applicant or its designee (including the Project’s HOA) shall contract with a service provider approved by the DSFPD or CAL FIRE; the service provider shall look to the SDFPD for payment from the District’s special reserve account; and the provider shall perform the following offsite Fuel Modification services along the Designated Route (Attachment A):

- Modify combustible vegetation, including raking, mowing, and tree and shrub thinning/trimming.
- Maintain minimum horizontal clearances for fire- and non-fire resistive trees and shrubs.
- Prune trees/large shrubs to remove limbs/branches and maintain vertical separation.
- Remove/rake deadwood, litter, pine needles, and other vegetation, and chipping removed vegetation (with chips left onsite).
- Perform all work through professional contractors, who are bonded and insured.

For purposes of the Fuel Modification services, “combustible vegetation” shall have the same meaning as defined in section 4902.1 of the 2017 Consolidated Fire Code for the 14 Fire Protection Districts in San Diego County, including the DSFPD.

As defined in Consolidated Fire Code section 4902.1, “combustible vegetation” means “material that in its natural state will readily ignite, burn, and transmit fire from native or landscape plants to any structure or other vegetation. Combustible vegetation includes dry grass, brush, weeds, litter, or other flammable vegetation that creates a fire hazard.

**Fire Safe Council**

To further promote public safety and orderly evacuation, the Project applicant or its designee shall establish a Lilac Hills Ranch Fire Safe Council, managed and funded through the Project’s HOA, to perform the following additional offsite and onsite activities:

**Offsite**

- Provide education to Project and area residents about effective defensible space.
- On a quarterly basis, the Fire Safe Council will hold a community meeting and disseminate information (both printed handouts, mailers, and emails) on community fire safety, defensible space, areas of temporary safe refuge (within the Project), evacuation protocols, and evacuation routes. The Fire Safe Council will coordinate with the DSFPD, the Deer Springs Fire Safe Council, and the Greater Valley Center Fire Safe Council to ensure that education activities, seminars, and presentations are consistent and include all Project and area residents.
- Implement the above Offsite Hardening Program, on coordination with the DSFPD.
- Establish a Defensible Space Assistance Program (D-SAP) for existing homes along the Designated Route (Attachment A).

The D-SAP will focus on locating resources for existing low-income seniors and physically disabled persons so they can adhere to defensible space regulations specified in the
County’s Consolidated Fire Code, as amended. Qualifying seniors and physically disabled persons must: (i) be over 60 or have a medical physical disability making it impossible for the person to do the clean-up work; and, (ii) must be deemed financially unable to hire a contractor: one-person household income must be less than $2,842 (monthly) or $34,100 (annually); and two-person household income must be less than $3,246 (monthly) and $38,950 (annually). The D-SAP will be funded through the $2 million fund created by this condition; and services shall be offered on a first-come first-served basis as program funds are available. The Project’s Fire Safe Council also may seek grant funds to supplement the funding of this program. The D-SAP services shall be performed by professional contractors, who are bonded and insured, and shall include: (a) brush and tree trimming/thinning; (b) raking of dead leaves and pine needles; (c) mowing; and, (d) chipping of removed vegetation (with chips left onsite). (Dead tree removal is not included in this program.)

Onsite

- Perform vegetation management within all common areas and along all roadways of the Project.
- Ensure privately-owned parcels meet fuel modification regulations.
- Provide certification of private parcels (delivered to the DSFPD) that the DSFPD and/or CAL FIRE can verify with its own inspectors that maintenance has been performed to maintain clearance to native vegetation; that ornamental vegetation is not likely to transmit fire; and that all common area defensible space is in compliance with state and local regulations.
- Provide education about effective defensible space, consistent with the County’s Consolidated Fire Code, as amended.

Legal Authority for Condition

The DSFPD, as the fire authority having jurisdiction, “may require a property owner to modify combustible vegetation in the area within 20 feet from each side of the driveway or public or private road adjacent to the property to establish a fuel modification zone.” (Sec. 4907.2.1.) The DSFPD also “has the right to enter private property to insure the fuel modification zone requirements are met.” (Sec. 4907.2.1.)

This condition facilitates the DSFPD’s pre-existing legal authority, pursuant to the County Consolidated Fire Code, by providing funding to implement the fire safety, fuel modification, and assessment program set forth herein.

To further facilitate implementation of this condition, the Project applicant has contacted all property owners along the (“WLR-Covey segment”) (Attachment B) and found that approximately sixty percent (60%) of the property owners either: (a) have existing easements on their property that already allow clearing within the right-of-way of the WLR-Covey segment (Attachment B); or (b) the property owners have signed letters requesting to be included in the Fuel Modification funding program herein. For all other property owners along the WLR-Covey Segment (Attachment B), the DSFPD may exercise its pre-existing legal authority granted under section 4907.2.1 of the County Consolidated Fire Code to require roadside modification of combustible vegetation and enter property to ensure fuel modification zone requirements are met.
Attachment A

*Designated Route for Fuel Modification*
Attachment B

WLR-Covey Segment
## Table 1 to LHR R (Clarified Condition)

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### NOTES:

1. Ongoing obligation to continue the offsite Annual Fuel Modification along the Designated Route shall be implemented by the Project’s Homeowners’ Association (HOA) at issuance of the 1,700th residential certificate of occupancy.
2. To be used for Annual Fuel Modification as may be needed, and/or the hardening of offsite habitable structures along West Lilac Road.
REVIRED LHR CONDITIONS OF APPROVAL 4 AND 9

The County of San Diego Planning Commission approved Lilac Hills Ranch (LHR) Tentative Map Conditions of Approval 4 and 9 have been combined, revised, and replaced by one clarified proposed map condition, titled “LHR 4 (Clarified).” The proposed condition is presented below.

LHR 4 (Clarified Condition 2)

Tentative Map Condition of Approval:

Background

Pursuant to County of San Diego (County) procedures, a Project applicant is required to obtain a completed and signed Project Facility Availability Form (DPLU Form-399F) from the “fire authority having jurisdiction” over a land use development project.

The Lilac Hills Ranch Project (Project) is located within the Deer Springs Fire Protection District (DSFPD or District), making DSFPD the fire authority having jurisdiction. Fire and emergency medical services would be provided by the DSFPD and/or the California Department of Forestry and Fire Protection (CAL FIRE). As required, the Project applicant obtained the completed and signed Project Facility Availability Form from the District Fire Chief; and in doing so, the DSFPD confirmed that the Project is eligible for fire service and that its fire protection facilities are currently adequate or will be adequate to serve the Project.

The DSFPD also imposed conditions on the Project. The first condition requires the Project to comply with the conditions set forth in the District’s four-page letter attached to the County’s completed Project Facility Availability Form. The second condition requires the Project to adhere to all Fire codes, Building codes, and County codes applicable at the time of Project commencement. The Project also has been conditioned to meet the County’s General Plan five-minute travel time by implementing one of four options listed in the August 7, 2015 Planning Commission Hearing Report. These District conditions are all part of the County Planning Commission’s conditions of approval for the Project.

In addition, the DSFPD has approved the Project’s Fire Protection Plan. The plan states the Project shall “provide fuel modification on either side of public roadways, pursuant to the County’s Consolidated Fire Code and the California Fire Code for clearance of brush and vegetative growth from roadways,“ along with the mandatory requirement to “modify combustible vegetation in the area within 10 feet from each side of a road or driveway to establish a fuel modification zone on fire apparatus access roads and driveways.” (Italics added.) This Fire Protection Plan condition is applicable to offsite public roadways (as the Project has no public roadways within the Project site).

This condition, as implemented in full below, expands the approved Fire Protection Plan’s requirement to modify the combustible vegetation in the area from within 10 feet to within 20 feet,
and applies the clearing requirement to the offsite road designated below to enhance fire safety and promote orderly evacuation.

**Condition**

**Easements and Funding for Fuel Modification**

Prior to issuance of the first occupancy permit within the Project, the Project applicant or its designee shall make reasonable efforts within a 60-90 day period to acquire easements from property owners to allow for modifications to combustible vegetation in the area within 20 feet from each side of the segment of West Lilac Road, as shown along the WLR-Covey Segment on Attachment B. The Project applicant or designee shall document its time and efforts in attempting to acquire such easements; and such documentation shall be provided to the County of San Diego (County) for a reasonableness determination based on objective criteria (i.e., reasonable time expended, confirmation of actual contact(s) made to property owners, a written summary of the outcome by parcel/property, a written summary of the amount expended in attempting to obtain easements and in obtaining same; and County determination shall be measured against a rule of reason).

The Project applicant or its designee shall offer consideration for said easements at fair market value as determined by a certified Member Appraisal Institute (MAI) appraiser; the amount paid for said easements shall be credited against (and reduce) the funds referenced in the next paragraph below.

If one or more easements cannot be obtained within the time specified, the County or the DSFPD will ensure vegetation clearing along the WLR-Covey Segment (see Attachment B), using the funds provided below. The legal authority for such roadside vegetation modification is section 4907.2.1 of the County Consolidated Fire Code, as explained below.

As a condition of tentative map approval, the Project applicant or its designee shall enhance public safety and promote orderly evacuation by providing the total sum of not to exceed two million dollars ($2,000,000.00) to the DSFPD in the manner described below, for the purpose of: (a) removing, clearing, and/or modifying combustible vegetation (Fuel Modification) in the offsite area within 20 feet from each side of West Lilac Road from Circle R Drive to Old Highway 395 and Circle R Drive from West Lilac Road to Old Highway 395 (Designated Route), as shown on Attachment A, Offsite Fuel Modification Zone; and (b) hardening existing offsite residences along the Designated Route (Attachment A), as described below.

- **Initial Fuel Modification Payment**: Upon issuance of the first residential certificate of occupancy within the Project, the Project applicant or designee shall pay the DSFPD the upfront sum of $266,600.00 for initial Fuel Modification (Initial Fuel Modification).

- **Annual Fuel Modification Payments**: Upon the first anniversary date of the issuance of the first residential certificate of occupancy within the Project and every year thereafter as shown on Table 1, the Project applicant or designee shall pay the DSFPD the annual sum of $78,910.00 for Fuel Modification (Annual Fuel Modification).
- **Additional Funding:** At each certificate of occupancy evenly divisible (e.g., 100th, 200th, 300th, etc.), the Project applicant or its designee shall pay to the DSFPD the additional sum of $57,273.00 (Additional Funding), to be used for Annual Fuel Modification as may be needed, and/or the hardening of offsite habitable structures along West Lilac Road (Attachment A) (Offsite Hardening). The Offsite Hardening shall include and not be limited to: (a) retrofitting/installing existing eave, roof, and foundation vents with approved ember-resistant vents; and/or (b) retrofitting/installing dual-paned/tempered replacement windows, approved fire-resistive siding, enclosed boxed eaves, and approved Class A rated roof covering. Existing property owners along West Lilac Road (Attachment A) will be invited to submit a written request to the DSFPD to participate in this Offsite Hardening program; and the DSFPD will direct the Project applicant or designee to implement said program on a first come, first serve basis and subject to the amounts identified herein.

The funding for the Initial Fuel Modification, the Annual Fuel Modification, and the Additional Funding shall be placed in a special reserve account as directed by DSFPD, the purpose of which shall be limited solely to implementing this condition, and such funds shall not be used for any other purpose.

The ongoing obligation to continue the offsite Annual Fuel Modification along the Designated Route (Attachment A) shall be implemented by the Project’s Homeowners’ Association (HOA) at issuance of the 1,700th residential certificate of occupancy. To illustrate the payment breakdown, please see Table 1.

The Project applicant or its designee (including the Project’s HOA) shall contract with a service provider approved by the DSFPD or CAL FIRE; the service provider shall look to the SDFPD for payment from the District’s special reserve account; and the provider shall perform the following offsite Fuel Modification services along the Designated Route (Attachment A):

- Modify combustible vegetation, including raking, mowing, and tree and shrub thinning/trimming.
- Maintain minimum horizontal clearances for fire- and non-fire resistive trees and shrubs.
- Prune trees/large shrubs to remove limbs/branches and maintain vertical separation.
- Remove/rake deadwood, litter, pine needles, and other vegetation, and chipping removed vegetation (with chips left onsite).
- Perform all work through professional contractors, who are bonded and insured.

For purposes of the Fuel Modification services, “combustible vegetation” shall have the same meaning as defined in section 4902.1 of the 2017 Consolidated Fire Code for the 14 Fire Protection Districts in San Diego County, including the DSFPD.

As defined in Consolidated Fire Code section 4902.1, “combustible vegetation” means “material that in its natural state will readily ignite, burn, and transmit fire from native or landscape plants to any structure or other vegetation. Combustible vegetation includes dry grass, brush, weeds, litter, or other flammable vegetation that creates a fire hazard.

**Fire Safe Council**
To further promote public safety and orderly evacuation, the Project applicant or its designee shall establish a Lilac Hills Ranch Fire Safe Council, managed and funded through the Project’s HOA, to perform the following additional offsite and onsite activities:

**Offsite**

- Provide education to Project and area residents about effective defensible space.
- On a quarterly basis, the Fire Safe Council will hold a community meeting and disseminate information (both printed handouts, mailers, and emails) on community fire safety, defensible space, areas of temporary safe refuge (within the Project), evacuation protocols, and evacuation routes. The Fire Safe Council will coordinate with the DSFPD, the Deer Springs Fire Safe Council, and the Greater Valley Center Fire Safe Council to ensure that education activities, seminars, and presentations are consistent and include all Project and area residents.
- Implement the above Offsite Hardening Program, on coordination with the DSFPD.
- Establish a Defensible Space Assistance Program (D-SAP) for existing homes along the Designated Route (Attachment A).

The D-SAP will focus on locating resources for existing low-income seniors and physically disabled persons so they can adhere to defensible space regulations specified in the County’s Consolidated Fire Code, as amended. Qualifying seniors and physically disabled persons must: (i) be over 60 or have a medical physical disability making it impossible for the person to do the clean-up work; and, (ii) must be deemed financially unable to hire a contractor: one-person household income must be less than $2,842 (monthly) or $34,100 (annually); and two-person household income must be less than $3,246 (monthly) and $38,950 (annually). The D-SAP will be funded through the $2 million fund created by this condition; and services shall be offered on a first-come first-served basis as program funds are available. The Project’s Fire Safe Council also may seek grant funds to supplement the funding of this program. The D-SAP services shall be performed by professional contractors, who are bonded and insured, and shall include: (a) brush and tree trimming/thinning; (b) raking of dead leaves and pine needles; (c) mowing; and, (d) chipping of removed vegetation (with chips left onsite). (Dead tree removal is not included in this program.)

**Onsite**

- Perform vegetation management within all common areas and along all roadways of the Project.
- Ensure privately-owned parcels meet fuel modification regulations.
- Provide certification of private parcels (delivered to the DSFPD) that the DSFPD and/or CAL FIRE can verify with its own inspectors that maintenance has been performed to maintain clearance to native vegetation; that ornamental vegetation is not likely to transmit fire; and that all common area defensible space is in compliance with state and local regulations.
• Provide education about effective defensible space, consistent with the County’s Consolidated Fire Code, as amended.

Legal Authority for Condition

The DSFPD, as the fire authority having jurisdiction, “may require a property owner to modify combustible vegetation in the area within 20 feet from each side of the driveway or public or private road adjacent to the property to establish a fuel modification zone.” (Sec. 4907.2.1.) The DSFPD also “has the right to enter private property to insure the fuel modification zone requirements are met.” (Sec. 4907.2.1.)

This condition facilitates the DSFPD’s pre-existing legal authority, pursuant to the County Consolidated Fire Code, by providing funding to implement the fire safety, fuel modification, and assessment program set forth herein.

To further facilitate implementation of this condition, the Project applicant has contacted all property owners along the WLR-Covey Segment (Attachment B) and found that approximately sixty percent (60%) of the property owners either: (a) have existing easements on their property that already allow clearing within the right-of-way of the WLR-Covey Segment (Attachment B); or (b) the property owners have signed letters requesting to be included in the Fuel Modification funding program herein. For all other property owners along the WLR-Covey Segment (Attachment B), the DSFPD may exercise its pre-existing legal authority granted under section 4907.2.1 of the County Consolidated Fire Code to require roadside modification of combustible vegetation and enter property to ensure fuel modification zone requirements are met.
Attachment A

Designated Route for Fuel Modification
Attachment B

WLR-Covey Segment
### Table 1 to LHR R (Clarified Condition)

**ILLUSTRATIVE FUNDING OF PROPOSED CONDITION**

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**NOTES:**

1. Ongoing obligation to continue the offsite Annual Fuel Modification along the Designated Route shall be implemented by the Project's Homeowners' Association (HOA) at issuance of the 1,700th residential certificate of occupancy.

2. To be used for Annual Fuel Modification as may be needed, and/or the hardening of offsite habitable structures along West Lilac Road.

[¹ HOA]

[² Additional Funding]
ATTACHMENT 8
EMAIL FROM CALFIRE UNIT CHIEF RE: MILLER STATION
(MECHAM, APRIL 21, 2015)
From: Mecham, Tony@CALFIRE [mailto:Tony.Mecham@fire.ca.gov]
Sent: Tuesday, April 21, 2015 1:37 PM
To: Jon Rilling
Subject: RE: Miller Station

John
Miller is funded by CAL FIRE for 8 months of operations. April 15 – Dec 15. This is the budgeted period for our seasonal workforce. The Captains are funded year round.

The County funds 9 Amador stations which essentially funds the month gap period for the Firefighters. The 9 stations are at the discretion of the Unit Chief. **We consider Miller one of the essential priority stations used to cover portions of CSA 135 and therefore Miller will remain as one of our Amador Stations.**

Tony Mecham
Unit and County Fire Chief
CAL FIRE San Diego
Proudly serving the San Diego County Fire Authority, San Miguel Fire District, San Diego Rural Fire District, Pine Valley Fire District, Deer Springs Fire District, Ramona Municipal Water District, Yuima Municipal Water District
ATTACHMENT 9
GENERAL PLAN CONSISTENCY ANALYSIS
(POLICIES S-1.1, S-3.1 AND S-3.6)
**Policy S-1.1**  
**Minimized Exposure to Hazards.** Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

**Consistent.** Various sections of the EIR (e.g., Sections regarding Geology and Soils and Hazards) evaluate potential health and safety issues related to people and property within the Project. The EIR either identified no impacts associated with potential hazards or required mitigation to ensure that all potentially significant hazards are reduced to less than significant. In addition, the Project is located within the DSFPD. There are four fire stations located within the DSFPD. Miller Station is located adjacent to the development and approximately 2.3 miles from the furthest structure when the development is fully constructed. DSFPD would have the capacity to respond to expected calls from the proposed Lilac Hills Ranch project (Dudek and Hunt Capacity Report 2015).

The proposed Project is located within a network of fire access roadways that provide connectivity and circulation in and around the community that will ensure successful evacuation of the Project, and the existing community. In addition, the Project will construct new insulated routes for evacuation (Roundabout Connection Road, Southerly/connection Road); modernize Nelson Way to provide an additional evacuation route (see Compendium Volume II, Attachment 8); and make existing roadways safer and increase evacuation capacity (See Compendium Volume II, Attachment 12 and Attachment 16. Finally, the Project will provide a total of up to two million dollars to County Fire Authority, Community Risk Reduction-Prevention Division (CFA-CRPD), in part to fund fuel modification activities along West Lilac Road, enhancing the condition of this offsite evacuation route.

A Fire Protection Plan (“FPP”) for Lilac Hills Ranch was prepared in accordance with the DSFPD Ordinance No. 2010-01 (“District Standards”) and the County guidelines and referenced material in the 2011 Consolidated Fire Code, Guidelines for Determining Significance (See Appendix J to the EIR). The FPP evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard.

With respect to impacts of the proposed Project on wildfire safety, such risks were assessed by fire prevention officers and fire fighters, wildfire academic researchers, and fire protection planners, each with decades of experience. A programed approach that includes wildfire safety measures were designed to enhance the LHR community’s fire safety, as well as the safety of the surrounding region. The wildfire threat will be mitigated to less than significant with the incorporation of the design features described in the FPP- (including the undergrounding of utility lines and FMZs) and the conditions applied to the Project, as described in the LHR Wildfire Safety Compendium.

Conditions added to the Project include:

1. establishing a Mello-Roos (CFD) for ongoing staffing for the fire station;
2. constructing new insulated routes for evacuation (Roundabout Connection Road, Southerly/connection Road);
3. modernizing Nelson Way to provide an additional evacuation route (see Compendium Volume II, Attachment 8);
4. making existing roadways safer and increasing evacuation capacity (See Compendium Volume II, Attachment 12 and Attachment 16).
5. providing a total of up to two million dollars to County Fire Authority, Community Risk Reduction-Prevention Division (CFA-CRPD) for the purpose of i) providing fuel modification along offsite evacuation routes, and ii) hardening existing offsite homes;
6. the project will create the Lilac Hills Ranch Fire Safe Council to be managed by the HOA to perform annual fuel modification activities along West Lilac Road by a service provider approved by CalFire;
7. installing evacuation signs at strategic locations along on-site roadways, chosen in consultation with County Fire Authority;
8. providing funding, up to $100,000 to County Fire Authority (CFA) for interactive signs in the vicinity of the Project boundaries;
9. constructing a hardened cell tower with battery backup within the town center the Project; and,
10. funding a RAWS unit on the CALFIRE Miller Station.

In particular, with the application of these conditions there will be no fewer than six routes available for a vehicle at West Lilac and Covey Lane to evacuate, compared to a single route available today. (Figure 18 and Figure 15, respectively). Thus, the project’s design features and conditions of approval that reflect the site-specific constraints and hazards associated with the location of this Project will minimize the population’s exposure to fire hazards.

**Policy S-3.1 Minimized Fire Hazards. Minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards.**

**Consistent.** The Project is located within the DSFPD. There are four fire stations located within the DSFPD. Miller Station is located adjacent to the development and approximately 2.3 miles from the furthest structure when the development is fully constructed. DSFPD would have the existing capacity to respond to expected calls from the proposed Lilac Hills Ranch project (Dudek and Hunt Capacity Report 2015). A Fire Protection Plan (“FPP”) for the Lilac Hills Ranch project was prepared in accordance with DSFPD Ordinance No. 2010-01 (“District Standards”) and the County guidance and referenced material in the 2011 Consolidated Fire Code, Guidelines for Determining Significance (See Appendix J to the EIR). The FPP evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard.

In addition, the impacts of the proposed Project on wildfire threats safety were assessed by fire prevention officers and fire fighters, wildfire academic researchers, and fire protection planners, each with decades of experience. A programed and comprehensive approach was established to reduce risks during wildland fire events by ensuring that the Project has put into place appropriate precautions and measures. This systematic approach includes:

1. A network of fire access roadways that provide connectivity and circulation in and around the community that will enhance successful evacuation of the region;
2. Ongoing fuel modification along ingress and egress roadways that is performed programatically;
3. Adequate firefighting water supplies;
(4) Fire-resistive construction features on all structures within the new development and resources that will also benefit existing community residents;

(5) Strategically located and properly equipped/trained fire suppression resources; and, (6) An educated community that embraces a culture of fire safety. (See Table 1 of the LHR Wildfire Safety Compendium, Jan 15, 2020.)

Threats from structural or wildland fire will be mitigated to less than significant, thus minimizing injury, loss of life and damage to property, by the incorporation of the following: Project design features described in the FPP. These design features include the following: FMZs; that range between 100 feet and 150 feet, and, in addition will be buffered by a managed agricultural zones in some locations (for a total managed buffer exceeding 150 feet); the use of ignition resistant building materials; fire and building code guidance for the protection of non-residential structures; the provision of fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. In addition, mitigation measure M-HZ-1 provides alternative measures to achieve the same level of protection from potential wildfires, when the 100 foot FMZ cannot be met on-site.; all structures within the Project will be required to comply with the Ignition-resistant construction requirements of Chapter 7A of the Building Code. All streets and gates within the project site would be designed in accordance with the DSFPD’s road standards and the County Consolidated Fire Code and Private Road Standards complying with travel lane width, grade, surface, radius, and other requirements except for the exceptions requested for design speed. In addition a number of options to meet the County’s Travel Time standards are provided in the Capabilities Assessment.

In addition the following conditions will be applied to the Project, as described in the LHR Wildfire Safety Compendium:

1. establishing a Mello-Roos (CFD) for ongoing staffing for the fire station;
2. constructing new insulated routes for evacuation (Roundabout Connection Road, Southerly /connection Road);
3. modernizing Nelson Way to provide an additional evacuation route (see Compendium Volume II, Attachment 8);
4. making existing roadways safer and increasing evacuation capacity (See Compendium Volume II, Attachment 12 and Attachment 16);
5. providing a total of up to two million dollars to County Fire Authority, Community Risk Reduction-Prevention Division (CFA-CRPD) for the purpose of i) providing fuel modification along offsite evacuation routes, and ii) hardening existing offsite homes;
6. the project will create the Lilac Hills Ranch Fire Safe Council to be managed by the HOA to perform annual fuel modification activities along West Lilac Road by a service provider approved by CalFire;
7. installing evacuation signs at strategic locations along on-site roadways, chosen in consultation with County Fire Authority;
8. providing funding, up to $100,000 to County Fire Authority (CFA) for interactive signs in the vicinity of the Project boundaries;
9. constructing a hardened cell tower with battery backup within the town center the Project; and,  
10. funding a RAWS unit on the CALFIRE Miller Station.
In particular, with the application of these conditions there will be no fewer than six routes available for a vehicle at West Lilac and Covey Lane to evacuate. Thus, the design features and conditions described above will minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards.

Policy S-3.6 Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.

Consistent. A Fire Protection Plan for Lilac Hills Ranch was prepared in accordance with DSFPD Ordinance No. 2010-01 (“District Standards”) and the County guidelines and referenced material in the 2011 Consolidated Fire Code, Guidelines for Determining Significance (See Appendix J to the EIR). The FPP evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard. The wildfire threat will be mitigated to less than significant by the incorporation of the following Project design features: FMZs:

1. the undergrounding of utility lines;
2. the use of ignition resistant building materials;
3. fire and building code guidance for the protection of non-residential structures;
4. the provision of fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. In addition, mitigation measure M-HZ-1 provides alternative measures to achieve the same level of protection from potential wildfires, when the 100 foot FMZ cannot be met on-site; and
5. all structures within the Project will be required to comply with the Ignition-resistant construction requirements of Chapter 7A of the Building Code. All;
6. streets and gates within the project site would be designed in accordance with the DSFPD’s road standards and the County Consolidated Fire Code and Private Road Standards complying with travel lane width, grade, surface, radius, and other requirements, except for the exceptions requested for design speed;
7. FMZs that range between 100 feet and 150 feet, and, in addition will be buffered by a managed agricultural zones in some locations (for a total managed buffer exceeding 150 feet); and,
8. a number of options to meet the County’s Travel Time standards are provided, as identified in the Capabilities Assessment.

In addition to roadway, fuel modification, and construction improvements and other improvements to enhance fire safety and evacuation, the Project will designate facilities and areas for a shelter-in-place: Shelter-in-place facilities:

a. The following hardened facilities will be stocked with situational awareness and emergency supplies:
   i. 5,000 sqft community center in Phase 1;
   ii. 10,000 sqft, combined between community center and/or school gym, and/or purpose-built shelter in place facility in Park 7;
   iii. 5,000 sqft community center in Phase 4.
b. Shelter-in-place areas: As an additional safety location, particularly for the temporary placement of livestock and horse trailers, the Project designates the following areas:

iv. Parklands: P-7 Community Park (13.5-acres) offers significant parking areas and grass fields sufficient to provide refuge from nearby fires during moderate to high severity wildfire events;

v. Town Center (Town Square & Commercial Parking Areas).

The following additional conditions will be applied to the Project, as described in the LHR Wildfire Safety Compendium:

9. establishing a Mello-Roos (CFD) for ongoing staffing for the fire station;
10. constructing new insulated routes for evacuation (Roundabout Connection Road, Southerly /connection Road);
11. modernizing Nelson Way to provide an additional evacuation route (see Compendium Volume II, Attachment 8);
12. making existing roadways safer and increasing evacuation capacity (See Compendium Volume II, Attachment 12 and Attachment 16);
13. providing a total of up to two million dollars to County Fire Authority, Community Risk Reduction-Prevention Division (CFA-CRPD) for the purpose of i) providing fuel modification along offsite evacuation routes, and ii) hardening existing offsite homes;
14. the project will create the Lilac Hills Ranch Fire Safe Council to be managed by the HOA to perform annual fuel modification activities along West Lilac Road by a service provider approved by CalFire;
15. installing evacuation signs at strategic locations along on-site roadways, chosen in consultation with County Fire Authority;
16. providing funding, up to $100,000 to County Fire Authority (CFA) for interactive signs in the vicinity of the Project boundaries;
17. constructing a hardened cell tower with battery backup within the town center the Project; and,
18. funding a RAWS unit on the CALFIRE Miller Station.

In particular, with the application of these conditions there will be no fewer than six routes available for a vehicle at West Lilac and Covey Lane to evacuate. The design features and conditions of approval described above will reduce the risk of structural and human loss due to wildfire.
May 20, 2020

Via Electronic Mail Only

Chairman Douglas Barnhart
San Diego County Planning Commission
Ann.Jimenez@sdcounty.ca.gov

Director Mark Wardlaw
Planning & Development Services
mark.wardlaw@sdcounty.ca.gov

Thomas Montgomery
San Diego County Counsel
Thomas.Montgomery@sdcounty.ca.gov

Mark Slovick
PDS Project Contact
mark.slovick@sdcounty.ca.gov

Re: Formation of “Ad Hoc Committee” concerning the Lilac Hills Ranch Project

Dear Chairman Barnhart and Members of the Planning Commission:

On behalf of Cleveland National Forest Foundation (“CNFF”) and Save Our Forest and Ranchlands (“SOFAR”), two organizations dedicated to progressive land use planning and the protection of vital natural resources, I write regarding the San Diego County Planning Commission’s discussion of the Lilac Hills Ranch Project (“Project”) at the culmination of the May 15, 2020 Planning Commission Meeting. As detailed below, the Commission’s discussion and action at the May 15 Meeting violated the Brown Act. Moreover, the formation of an ad hoc committee as contemplated would directly conflict with County requirements intended to ensure impartial and transparent decisionmaking. As a result, CNFF and SOFAR urge you to halt any further Planning Commission consideration of the Project, including any attempted formation of an “ad hoc” committee.

I. Background

While not formally agendized, the Planning Commission typically receives a “Director’s Report” at the end of Planning Commission meetings. This item is generally an opportunity for the Planning and Development Services Director to provide updates to the Planning Commission regarding implementation of approved projects or upcoming events or agenda items.
On May 15th, rather than waiting for a report, however, Commissioner Edwards immediately offered comment on the Project. He shared his concerns that County Staff and the Project applicant had expended significant time and resources on the Project’s development and review, but had apparently reached an impasse regarding the Project’s significant risks to public health and safety. He suggested the immediate formation of a “ad hoc” committee to mediate the dispute and to find “solutions or recommendations” regarding the Project.

Commissioner Woods supported the proposal, stating his belief that “it is possible to find a solution” to the problems identified by County Staff to forward to the Board. He also stated his opinion that formation of the ad hoc committee could happen immediately, and need not be agendized.

Finally, Chairman Barnhart expressed his opinion that the Project had been stalled due to “human dynamics” and that the ad hoc committee could be used to “get the staff to come on board a little bit” with the Project. At the very end of the discussion, he stated that he would “appoint Commissioners Edwards and Woods” to the ad hoc committee. He then abruptly ended the meeting without any clarification regarding this apparent appointment.

II. The Planning Commission’s Discussion of and Action on the Project “Ad Hoc” Committee Violated the Brown Act.

The Commission’s actions on May 15th violated the Brown Act, which prohibits any “action or discussion” on any item not appearing on the posted agenda. Government Code § 54954.2(a)(3). The Lilac Hills Ranch Project did not appear on the agenda or in any of the posted material for the meeting, nor was the letter referenced by Commissioner Edwards made available to the public.

The discussion between the Commissioners went far beyond the types of non-substantive comments on non-agendized topics permitted under the Brown Act. Id. (permitting “ask[ing] a question for clarification,” “brief announcements,” “brief reports,” “references . . . for factual information,” or “requests for a report back”); see also Open & Public V, A Guide to the Ralph M. Brown Act, at 34 (stating such exceptions are “very limited”). Four commissioners shared their substantive views on the relative importance of seeing the Project to completion, the potential for resolution of the fire safety issues identified by County Staff, and the appropriateness of the process afforded to the applicant in light of those issues. The discussion lasted over twenty minutes.
While the Brown Act allows Commissioners to “take action to direct staff to place a matter of business on a future agenda,” this exception must not be expanded so as to swallow the general rule. At most, the Planning Commission was permitted to direct staff to prepare an agenda item for a later Commission meeting to discuss the Project and the appropriateness or legality of an “ad hoc” committee. The discussion when far beyond such direction.

Even more troubling is Chairman Barnhart’s decision at the end of the meeting to “appoint” Commissioners Edwards and Woods to this apparent ad hoc committee. Given Chairman Woods’ comments earlier in the meeting as to his belief that an ad hoc committee could be lawfully formed without public notice, it is entirely unclear whether Chairman Barnhart believed he was acting to create the committee and appoint its two members. But there is nothing in the Brown Act that allows the creation of such a committee without providing public notice or following the appropriate procedures. This action was invalid and must be rescinded. Government Code § 54960.1.

III. The Formation of Any Ad Hoc Committee Violates County Code.

Commissioner Edwards’ idea—to form an “ad hoc” committee comprised of Planning Commissioners to meet with planning staff and/or the applicant in order to mediate the dispute and “offer solutions” regarding the Project—violates both core principles of transparency and impartiality in local decisionmaking and explicit provisions of the County Code. Presumably, such mediation and solution-finding would take place behind closed doors and without any public input, such that the public would have little opportunity to understand the seriousness of the safety issues or the importance of the conditions apparently requested by the Fire Marshal before a “solution” was found.

In light of the importance of transparency and a public decisionmaking process, the County Code strictly limits the ability of Planning Commissioners to meet with staff or applicants, receive evidence, or discuss projects outside of a public hearing. These limitations are intended to ensure that the public has full access to the County’s decisionmaking process, and that negotiations and development of “solutions” does not happen behind closed doors.

Section 375 of the County Administrative Code is particularly relevant. This section governs all land use projects—such as Lilac Hills Ranch—for which a
noticed public hearing is required.\textsuperscript{1} Section 375.11 prohibits members of the Planning Commission, anytime “after an application necessitating a hearing has been filed with the County” from “discuss[ing] said matter with other members of a decision-making body or with proponents, opponents, or other interested parties, except in the course of and during said public hearing.” Consequently, Planning Commission members are prohibited from meeting with each other or the applicant, 

except in a Planning Commission hearing on Lilac Hills Ranch. There is no exception for an “ad hoc” committee.

Likewise, Section 375.12 prohibits Planning Commissioners from “solicit[ing] or receiv[ing] any substantive information from County staff outside of the public hearing on said matter.” Consequently, individual Planning Commissioners are prohibited from receiving information from staff regarding the public safety issues and the dispute between Planning Department staff and the applicant. Again, there is no exception for an “ad hoc” committee. And Section 375.8 prohibits Planning Commissioners from “solicit[ing] or receiv[ing] evidence outside of the public hearing,” including evidence from the applicant related to these issues.\textsuperscript{2}

The fact that the Planning Commission has already held public hearings on the Project is of no import. These prohibitions apply any time after an application necessitating a hearing has been filed; they do not expire after the Planning Commission has already acted. Moreover, if the Board acts to direct Staff to revise the Project and/or its environmental documents, it is likely that the Planning Commission will again hear the Project. These prohibitions are necessary to prevent Planning Commissioners from being unduly influenced toward a particular decision on the Project outside of a public process.

\textsuperscript{1} As the Lilac Hills Ranch Project includes a General Plan Amendment, Specific Plan and a Rezone, a noticed public hearing before both the Planning Commission and the Board of Supervisors is required.

\textsuperscript{2} The only potentially relevant exception to any of these prohibitions is that Planning Commission members can receive evidence related to a project via “participation . . . on a task force or committee that has been duly created by the Board.” Section 375.8(b)(5). However, this exception plainly applies only to task forces or committees created by the Board, not by the Commission itself. And there are no task force or other exceptions to the prohibitions on discussing the Project or receiving information from staff.
IV. Participation in an Ad Hoc Committee Would Create an Unacceptable Probability of Bias.

During the Planning Commission’s discussion of this issue, both County Counsel and Commissioner Seiler expressed concern that any Planning Commissioner’s participation in a “ad hoc” committee to “mediate” the dispute or “develop solutions” would create an unacceptable probability of bias. These concerns are well founded.

Under longstanding principles of procedural due process, “there must not be ‘an unacceptable probability of actual bias’ on the part of [a] municipal decision maker.” Woody’s Group, Inc. v. City of Newport Beach (2015) 233 Cal.App.4th 1012, 1022 (quoting Nasha v. City of Los Angeles (2004) 125 Cal.App.4th 470, 483). If a decision maker demonstrates commitment to a particular outcome in advance of a hearing—through actions such as speaking in favor or against a project, advocating for others to do the same, or bringing a motion to move a project forward or toward denial—they may not be part of the body hearing the project. Id. at 1023.

Here, the Planning Commissioners’ sole purpose in participating in the ad hoc committee would be to find a “solution” to the impasse currently in place between the applicant and County staff. It is clear that the “solution” envisioned by these Commissioners would be one that allowed the Project to move toward approval, not denial. Consequently, the participating Commissioners will have a vested interested in seeing their “solution” approved by the Planning Commission and ultimately the Board of Directors. This type of advanced commitment is precisely the type of action that has been found to raise an “unacceptable probability of actual bias.” Woody’s Group, 233 Cal.App.4th at 1022. If the ad hoc committee is created, contrary to County Code, it must be with the understanding that the participating Planning Commissioners will recuse themselves if the Project is ultimately heard by the Planning Commission.

V. Commissioner Edwards’ Appointment Raises Section 1090 Issues.

Commissioner Michael Edwards is a shareholder at Byron & Edwards, APC, and per his firm’s website, an active arbitrator for the Superior Court of the County of San Diego and the American Arbitration Association. Commissioner Edwards first suggested the possibility of an ad hoc committee, touting his years of experience in successfully mediating land use disputes, including the Otay Ranch project. He “volunteered [his] offices and [himself]” and offered to “donate time” to help resolve the dispute between County Staff and the applicant.
This offer of mediation or arbitration services raises potential issues under Government Code Section 1090. Pursuant to that section, Planning Commissioners are prohibited from being “financially interested in any contract made by them in their official capacity, or by a body or board of which they are members.” The Attorney General has found a financial interest in a voluntary arrangement with a law firm where a council member is partner, even if there are no fees for the service. 86 Ops.Cal.Atty.Gen. 138 (2003) (voluntary contract may have indirect economic benefit in the form of prestige or goodwill). To the extent Commissioner Edwards intends to volunteer his arbitration services in an official capacity, Section 1090 may prohibit such an arrangement.

VI. Conclusion

Finally, it does not escape CNFF’s and SOFAR’s attention that the Planning Commission completely reversed course with respect to this Project. In June 2018, when the Project was headed toward likely approval, the Planning Commission refused to even reopen public hearings on the Project, despite Staff’s recommendation and a clear legal obligation to do so. Now that the Project appears to be in trouble, the Planning Commission wants to rush in to find a solution that would allow approval. This apparent bias must not be exacerbated by the appointment of an unlawful ad hoc committee.

Thank you for your consideration. If you have any questions, please do not hesitate to contact me.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Sara A. Clark
Chairman Barnhart,
My name is Marc Nelson and my grandfather built Nelson Way back in the 1950’s. My family and I grew up on the road and I still operate a business along Nelson Way, south of the Lilac Hills Ranch. My family and I support the project and also support the latest proposal from the developer and the County to improve Nelson Way to make it better for emergencies and also for daily use. The neighbors and business owners are unanimously in support and would welcome the improvements. We request that the planning commission recommends approval of this project and the additional fire safety features that have been added over the last few years.

Sincerely,
Marcus Nelson
8320 Nelson Way
Escondido, ca. 92026
September 24, 2015

To: Cara Lacey, Acting Chief, Project Planning  cara.Lacey@sdcounty.ca.gov

CC:
Mark Wardlaw, Director DPDS  mark.wardlaw@sdcounty.ca.gov
Darren Gretler, Deputy Director DPDS  darren.gretler@sdcounty.ca.gov
William Witt, County Counsel  william.witt@sdcounty.ca.gov
Claudia Anzures, County Counsel  claudia.anzures@gmail.com

Subject: One hour meeting with PDS staff prior to Oct 1, 2015

Reference: Lilac Hills Ranch GPA 3800-12-001; SP 3810-12-001; TM5571 RPL5; TM 5572 RPL5

Dear Ms. Lacey:

To be most clear, the recorded Action Sheet Planning Commission Motions from the 9-11-15 are lacking in sufficient detail in five areas to the extent that “stand alone” they are subject to widely different interpretations and therefore inadequate for their intended purpose as presently written.

The Public is entitled to the Staff’s interpretation of this Public information prior to presentation of this information to the Board of Supervisors and/or the Board staff.

The Action Sheet Record of the nine (9) Conditions of Development that formed the basis of the Planning Commission 9-11-15 vote has the following areas in which the DPDS Staff interpretation of the recorded text requires further expansion in a timely and expeditious manner of what the County Staff interprets the meaning of the motion to be:

Item 1 – “1. 1. Require West Lilac Road along the northern boundary line to be built to the 2.2c standard with a 30-foot buffer and reduction of parkway on the north side..”

Required Action - Given this Planning Commission Condition, the text, and the extensive deliberation captured on video:

a).Indicate on a map with Assessor Parcel Numbers labeled: the proposed alignment of West Lilac Road from Old Highway 395 on the West; easterly to the eastern Project Boundary and Roundabout in a 2.2 C Road Design Standard configuration. Disclose the locations and dimensions of travel lanes, turn pockets, paved shoulders, and graded unpaved pathways.

b) Disclose the dimensional metrics meaning of “reduction of parkway on the north side.”
Item 2 – “5. Add a condition to require the applicant to fund and build a turn-key school at a site to be determined by the school district.”

Required Action - Given this Planning Commission Condition, the text, and the deliberation captured on video:

a). Does this proposed exaction include the cost of the land for the school site?

Item 3 – “6. Approve staff’s recommendation on road exceptions, except for West Lilac Road.”

Required Action - Given this Planning Commission Condition, the text, the deliberation captured on video, and the Staff’s interpretation of Item 1:

a). What are the required changes for Road Standard Design Exception Requests 1,2,3,4,5, and 6 compared to those included in the Draft Final EIR?

Item 4 – “7. The applicant shall construct the Town Center after 1,000 homes are built.”

Required Action - Given this Planning Commission Condition, the text, and the deliberation captured on video:

a). Does “construct” mean that the Town Center will be constructed and completed prior to issuance of the 1,001st building permit?

Item 5 – “9. Improve the wastewater facility no later than the 100th home.”

Required Action - Given this Planning Commission Condition, the text, and the deliberation captured on video:

a). What are the required improvements to the Lower Moosa Wastewater Treatment Facility that are required by the 100th unit?

It is of the utmost importance that your Department provide the answers to these questions enumerated above in a one hour meeting at County offices no later than October 1, 2015.
Please coordinate the meeting date and time with me.

Sincerely,

Mark Jackson
9550 Covey Lane
Escondido, CA 92026
(760)-731-7327
jacksonmark92026@gmail.com

CC:
Steve Hutchison
Will Woodward

Attachment:
Att 1 PC ACTIONS - PC ACTION SHEET 09-11-15 rev 01
Chairman Barnhart
VIA: PC Secretary Ann.Jimenez@sdcounty.ca.gov

When I read the notice all I could do is shake my head and think this is the most bizarre hearing I've ever seen and why is this not just a condition of approval. This developer has spent the last two years improving upon prior Staff and Commission recommendations, and they are not opposed to implementing whatever the County wants, so just condition them and let's move on. This is exactly why housing costs so much in the County, because of this never ending process, which increases the cost of each home by 40-50%. That's wrong and needs to be fixed.

I grew up in the area and simply said, we need growth in the County. We have a housing shortage of 180,000 units and we desperately need this project.

Please support this project and recommend it for Approval.

Thank you.

Matt Weaver
Principal
Land
Lee & Associates | North San Diego County
D 760.448.2458
C 619.203.4967
O 760.929.9700
F 760.493.4102
mweaver@lee-associates.com
www.leelandteam.com

LEE & ASSOCIATES
COMMERCIAL REAL ESTATE SERVICES

Lee Land Team
Corporate ID 01096996 | License ID 01367183
1900 Wright Place | Suite 200
Carlsbad, CA 92008
Confidentiality Notice: The information contained in this electronic e-mail and any accompanying attachment(s) is intended only for the use of the intended recipient and may be confidential. If any reader of this communication is not the intended recipient, unauthorized use, disclosure or copying is strictly prohibited, and may be unlawful. If you have received this communication in error, please immediately notify the sender by return e-mail, and delete the original message and all copies from your system. Thank you.
Dear Ms. Jimenez,

Could you please pass along to the Planning Commissioners this email before this Friday’s hearing at 9:00 am. Thank you.

Re: In support of a Lilac Hills Ranch PC Recommendation of Approval.

Dear Commissioners: It is unbelievable that the planners need more time to consider the Lilac Hills development. It has been more than a decade of studies, permits, conditions, elections and hearings costing millions of dollars and now another study is needed? It is no wonder the cost of housing is so high resulting in a shortage of about 180,000 homes in the County. Please approve the project now and send it on to the Board of Supervisors for approval as soon as possible. The County, including our children, need this project.

Also, please start reforming a 40 year old entitlement process that will generate more homes at affordable prices.

Thank you.

Patrick Miller, CCIM
Principal
Lee & Associates | North San Diego County

O  760.929.9700
pmiller@lee-associates.com
Dear Ann,

I have been involved with the lilac hills project as an outside proponent. I helped gather the 123,000 signatures needed to put on ballot.

In my 40 years as a real estate broker, the project holds more merit than all the inner city high rises. They have put so much time and effort into making it the best ever. Personally, I want to move into it when it is able to be lived in. I am 71 and this place has all I need to have a happy life with my wife.

When I spoke to some of my fire officials, I asked them how many stations were in close time frame to lilac and I was told 5, the most of any project in the county. In life there will always be something that is not perfect but can be made better. Lilac Hills is willing to work to make it better with the laws currently in place.

Can we finally get this one approved?

Paul Schumann
Good Day Ann Jimenez,

Would you inform the Planning Commission of my support for the Lilac Hills Ranch Project for this Friday’s Hearing.

Lilac Hills Ranch was deemed fire safe by County staff and the Planning Commission with input from the County Fire Authority in 2015 and reaffirmed this position in 2018. Since 2018, Lilac Hills Ranch has agreed to add several additional features to make the Project region even safer.

The County’s request for easements deviates materially from County precedent for land use project approvals. We are unaware of any other project in the County with this “easement” requirement. Adopting this new staff precedent for easements will greatly discourage new housing in our housing-starved County, because a single property owner will effectively hold veto power over the entire land use process, simply by refusing to grant an easement.

We ask the Planning Commission to assist. We have proposed solutions to break through the impasse with staff. The proposed solutions, combined with the Project’s fire safety enhancements, will improve fire safety for the Project region and serve as a model in the future.

Peter Lanham
BBSD Dir. & IT Operations
www.Battle-Buddies.us
Peter.Lanham@cox.net
760.798.0682

This electronic mail (including any attachments) may contain information that is privileged, confidential, and/or otherwise protected from disclosure to anyone other than its intended recipient(s). Any dissemination or use of this electronic mail or its contents (including any attachments) by persons other than the intended recipient(s) is strictly prohibited. If you have received this message in error, please notify me immediately by reply e-mail so that I may correct internal records. Please then delete the original message (including any attachments) in its entirety. Thank you.
June 12, 2019

TO: Supervisor Dianne Jacob, Chairwoman
    Supervisor Greg Cox, Vice Chairman
    Supervisor Kristin Gaspar
    Supervisor Nathan Fletcher
    Supervisor Jim Desmond

FROM: Andrew Potter
      Clerk of the Board of Supervisors

REFERRAL

Attached, for your information, is correspondence from Nina Kaiser regarding opposition to the Lilac Hills development. Thank you.

Respectfully,

ANDREW POTTER

Attachment

cc: Helen Robbins-Meyer, Chief Administrative Officer
    Sarah Aghassi, Deputy Chief Administrative Officer, Land Use and Environment Group
    Board of Supervisors Communications Received

AJP: dl
From: Desmond, Jim  
Sent: Tuesday, June 11, 2019 3:35 PM  
To: Nina Kaiser  
Cc: Mills, Benjamin; FGG-DL, LSDOCS  
Subject: RE: No on Lilac Hills  

Dear Nina,

Thank you for your email. I appreciate you sharing your thoughts on this matter. If this item comes before the Board of Supervisors, I will consider your input and all other input before making a decision.

Again, I appreciate you contacting my office. Please feel free to contact me or my Land Use Policy Advisor, Ben Mills, if you have any questions at (619) 531-5555.

Sincerely,

Jim Desmond  
County of San Diego  
Supervisor, 5th District  

-----Original Message-----
From: Nina Kaiser <nina@equinesculpture.com>  
Sent: Friday, June 7, 2019 7:34 AM  
To: Desmond, Jim <Jim.Desmond@sdcounty.ca.gov>  
Subject: No on Lilac Hills

I'd like to voice my opposition to Lilac Hills. The community did a fantastic job against getting it voted down, against overwhelming odds, and of course here it is again. Please listen to your constituency who elected you and not the developers.

One cannot build their way out of a housing crisis.

NINA KAISER  
858.688.5263  
www.ninakaiser.com  
www.equinesculpture.com
August 1, 2018

TO: Chairwoman Kristin Gaspar
    Vice-Chairwoman Dianne Jacob
    Supervisor Greg Cox
    Supervisor Ron Roberts
    Supervisor Bill Horn

FROM: DAVID HALL
    Clerk of the Board of Supervisors

Attached, for your information, is correspondence from Katherine Stewart regarding Lilac Hills Ranch.

Thank you.

Respectfully submitted,

[Signature]

DAVID HALL
Clerk of the Board of Supervisors

Attachment

cc: Helen Robbins-Meyer, Chief Administrative Officer
    Sarah Aghassi, Deputy Chief Administrative Officer, Land Use & Environment Group
    Communications Received

DCH:dl
From: Ron-Roberts@sdcounty.ca.gov [mailto:Ron-Roberts@sdcounty.ca.gov]
Sent: Tuesday, July 31, 2018 2:58 PM
To: Ron-Roberts
Subject: Form Mail

You've received a new form based mail from http://www.ronroberts.com/content/d4/en/contact.html.

Values:

userName : Katherine "Kay" Stewart
Email : info@kaylarch.com
Subject : Lilac Hills Ranch is just as bad now as it was when we voted it down last year Address : 2750 Wheatstone Street
# 102 City : San Diego State : CA Zip : 92111 Phone : 6192342668

Message :
The version of Lilac Hills Ranch that you will be voting on in a month or so doesn't alter the issues that the voters were concerned about when they voted it down last year. Please vote no. I was very disappointed that you voted for Harmony Grove South and Valliano despite the very thoughtful analysis by the many citizens hat show these two developments don't belong where they will be built. Please ONLY support development in Village Nodes. No more GPA's.
August 2, 2018

TO: Chairwoman Kristin Gaspar
Vice-Chairwoman Dianne Jacob
Supervisor Greg Cox
Supervisor Ron Roberts
Supervisor Bill Horn

FROM: DAVID HALL
Clerk of the Board of Supervisors

Attached, for your information, is correspondence from Mr. and Mrs. Seebach regarding amendments to the General Plan.

Thank you.

Respectfully submitted,

David Hall
Clerk of the Board of Supervisors

Attachment

cc: Helen Robbins-Meyer, Chief Administrative Officer
Sarah Aghassi, Deputy Chief Administrative Officer, Land Use & Environment Group
Communications Received

DCH:dl
-----Original Message-----
From: m. seebach [mailto:seebachm2@aol.com]
Sent: Wednesday, August 01, 2018 2:34 PM
To: Jacob, Dianne; Gaspar, Kristin; Roberts, Ron; Horn, Bill; Cox, Greg
Subject: Representing your constituents

Dear Supervisors,

Our representative government works only when elected officials are willing to stand with and represent their constituents.

Remember, 68% of county voters have asked you, (via Measure B) our elected officials not to amend our General Plan and to stand with and represent us in opposing projects such as Lilac Hills and Newland Sierra.

We know all the "bundled projects" coming up for your vote will be approved. That said, why can just 3 of 5 people not represent an overwhelming majority of county voters and hand us urban sprawl, emergency routes gridlocked and water usage that we do not want? And these homes will not be affordable to teachers, firefighters, police, etc.

So what are we left to do when you don't represent us? More referendums, lawsuits, et. al., are all unnecessary, if only you will represent us. Perhaps some people not coming up for reelection think "it doesn't matter". Those facing reelection must know and understand how not representing voters will play out in the media, news reports, election ads, debates, etc.

We ask you, represent our voices, stand with us and enforce the will of the people. Do not amend our General Plan.

Thank You,
SD County & District. 5 Concerned Voters Mr/Mrs M. Seebach
November 19, 2015

TO: Chairman Bill Horn
    Vice-Chairman Dave Roberts
    Supervisor Greg Cox
    Supervisor Dianne Jacob
    Supervisor Ron Roberts

FROM: DAVID HALL
    Clerk of the Board of Supervisors

Attached for your information is a communication from George Barnett regarding Lilac Hills Ranch.

Thank you.

Respectfully submitted,

[signature]

DAVID HALL
Clerk of the Board of Supervisors

Attachments

cc: Helen Robbins-Meyer, Chief Administrative Officer
    Sarah Aghassi, Deputy Chief Administrative Officer, Land Use & Environment Group
    Communications Received

DCH:cs
November 17, 2015

Board of Supervisors
c/o The Clerk of the Board
County Administration Center
1600 Pacific Highway
San Diego, CA 92101

Lilac Hills & Supervisor Bill Horn

Dear Board of Supervisors

I am an elected member a community planning group in East County. I have some knowledge of the County’s land use/development processes. I am also subject to bi-annual State ethics training and the annual County ethics training mandates. I have two concerns over Supervisor Horn’s latest effort to reverse FPPC’s guidance against his voting on the Lilac Hills project.

1. The entire crux of both State and County ethics training is to reinforce that even the **appearance of Conflict of Interest** must be avoided – all for the purpose of reinforcing the public’s positive view of its government structures and of its elected members. Supervisor Horn seems to seek a different standard for himself than he mandates as a Supervisor through set policy to those of us “further down the line” in the County hierarchy. That is wrong!

2. I am surprised at Supervisor Horn’s latest plea to the FPPC; in particular at his assertion that the topography of his property prohibits development. Yes, the County does have slope overlays in its planning review process. But topography is not always an insurmountable problem. Here’s just one example; the KB Homes project at Los Coches Road and Old Highway 80 in East County. The topography of the land is quite steep. But bulldozers have done a remarkable job in terracing the land to accommodate many dozens of new, near zero-lot line homes being priced now at the $550,000 plus range. Attached is a Google Earth view of that 20-acre “steep” site completely bulldozed into massive “platforms” of differing levels to support high density home construction. Supervisor Horn’s alleging that his property cannot be developed because of slope seems disingenuous. That would be wrong!

I would hope that someday as a private property owner Supervisor Horn can capitalize on his property’s intrinsic value. But he simply cannot at the present time. Nor can he vote on land use conditions today which will invariably positively impact the value of his land in the future. He cannot for as long as he is a sitting elected official.

Supervisor Horn’s voting as a Supervisor on the Lilac Hills project, no matter how he may vote - either ‘yea’ or ‘nay’, is a direct Conflict of Interest! Nor can he abstain! By State and County ethics guidelines, he must “recuse” himself completely from even discussions concerning the Lilac Hills project. To not do so is directly against the intents of the State ethics training (as administered by the FPPC) and County ethics training (as administered by the Board of Supervisors’ county-wide policy).

Supervisor Horn’s perseverance in getting a special consideration from the FPPC for his particular circumstance is damaging the public’s perception of openness, transparency and honesty in the Board of Supervisors as a whole.

George Barnett
2194 Paseo Donito
Alpine, CA 91901
BigB88882@cox.net
619-659-0314

Attachment: Google Earth view of high density residential development on steep land
KB Homes 20-acre High-Density Residential Development
Los Coches Road & Old Highway 80 in East County
ATTACHMENT

For Lilac Hills Ranch

Wednesday,
October 28, 2015

PUBLIC COMMUNICATION RECEIVED BY THE CLERK OF THE BOARD
THIS PAGE IS INTENTIONALLY LEFT BLANK.
From: Lisa Cherico [mailto:lisac@klainc.com]
Sent: Wednesday, September 30, 2015 4:01 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

The developers want to build a "village destination", none of the residents who have already purchased homes, and paid taxes in this area want to live in a village, if we did we would have moved to Carlsbad or San Marcos. I personally purchased a home in Fallbrook for the RURAL lifestyle.

Additionally, the areas of Fallbrook and Valley Center already do not have enough water, power, roads, fire fighters etc. I do not understand how the board can approve a project of this magnitude, while at the same time the State is constantly telling residents we do not have enough resources for the existing homes.

Please consider the people in the area, and our quality of life. If this project is as the developers claim, good for the existing community, please ask them to put it on the ballot.

Sincerely
Lisa Cherico

Sincerely,

Lisa Cherico

Fallbrook 92028
From: Kristi Davis [mailto:ksales@hotmail.com]
Sent: Wednesday, September 30, 2015 4:03 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

The board of supervisors approved the current general plan and I see no reason to grant special favors & exemptions for deviations from this general plan.

We do not need to destroy farmland for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs. As you are aware, building where there is no infrastructure just increases the cost of housing in order to provide the necessities of life. This will not make for "affordable" housing!

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a
hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.

The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Kristi Davis

Escondido 92026-5915
From: Cox, Greg
Sent: Wednesday, September 30, 2015 4:05 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Linda Camp [mailto:trailpaloma@yahoo.com]
Sent: Wednesday, September 30, 2015 4:04 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Linda Camp

escondido 92026
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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Darin Pines

Valley Center 92028
From: Karen Langer Baker [mailto:karenlangerbaker@gmail.com]
Sent: Wednesday, September 30, 2015 4:09 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
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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 are the foundation of the General Plan.

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

Sincerely,

Karen Langer Baker

Fallbrook 92028
To the San Diego Board of Supervisors:

We are writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

Our family has lived in this area for 18 years and we enjoy the rural surroundings. Our belief has always been it would remain protected in some way due to the guidelines of the County General Plan. Now we find ourselves defending the very document that was created to stop this type of expansion.

While we understand the need for growth there is also the need to properly control that growth. Areas such as Lilac Hills fall completely outside of that plan. Building such a large scale development in an area that has nothing like this now will completely destroy it. This is NOT planned and controlled growth.

Lastly we as a family have a concern for our safety in the event of a wildfire. The Lilac bridge is only so wide and to the best of our knowledge can not easily be widened. During the last wildfires in the area West Lilac Rd was completely gridlocked. We can not imagine adding possibly 5000 or more people in the area and having anyone think we could evacuate safely.

Please follow the General Plan and put this project out of scope as it should be.

Thank you,

The Martino's

Gary Martino

Escondido 92026
From: Jennifer Lindley [mailto:jenniferlindley72@gmail.com]
Sent: Wednesday, September 30, 2015 4:39 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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

Sincerely,

Jennifer Lindley

Valley Center 92082
From: Kathe Robbins [mailto:katherobbins@gmail.com]
Sent: Wednesday, September 30, 2015 4:55 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We have a general plan that needs to be followed. Look to the Sprinter corridor in San Marcos, with housing being developed along transportation lines. We need to develop more transit opportunities and follow that with housing.

We do not need to destroy farmland for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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Sincerely,

Kathe Robbins

San Marcos 92069
To the Honorable San Diego Board of Supervisors:

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

The traffic on our current roads are HORRENDOUS NOW! I can't imagine how long the lines will be coming down Circle R Drive to Highway 395. The current wait during the week is between 10 and 30 cars. What will it be like with more homes here! Even with a traffic light it will be a very crowded condition. It is easy for someone not living here to think all is well. I ask each of the Supervisors to come out here and stand at the Fire Station at Circle R Drive at 7:00am to 8:00am and see what it is like. You may think you are too busy, but your vote is important and your valuable time will be well served to spend just one hour seeing what we see every day. PLEASE!

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

Also, ignoring the general plan, in this instance, is UNNECESSARY. There is adequate land available in the county to satisfy all the growth needed. Isn't that why you had a General Plan in the first place!

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

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Sincerely,

Hal Helfand

Escondido 92026
From: Alan Miller [mailto:Alanmillercabinets@gmail.com]
Sent: Wednesday, September 30, 2015 4:22 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Alan Miller

Bonsall 92003
From: Linda M Nelson [mailto:linda@glnelson.com]  
Sent: Wednesday, September 30, 2015 4:17 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

My husband and I retired 4 years ago. We moved to our wonderful home in Circle R Estates that unfortunately is adjacent to the proposed LHR proposed development. We took all of our retirement housing monies to purchase a property at a bank sale, after looking for our perfect house for over 2 years. There was no disclosure that the pastoral private road (Mountain Ridge) would be hi-jacked and used by a developer who's only interest is making money. This is a private road only used by the less than 25 homes in this immediate area. LHR would make it a public road with hundreds of trips using it per day. This road is also our only means of ingress and egress on a daily basis and in the event of a wild fire. There is no honest means of a safe way of exiting on this road nor Circle R with is the primary means of exiting the area. It would be a disaster and possible death for many people who could be trapped here.

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Sincerely,

Linda M Nelson

Escondido 92026
From: Dan Dakovich [mailto:dddakovitch@gmail.com]
Sent: Wednesday, September 30, 2015 4:20 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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Sincerely,

Dan Dakovich

Fallbrook 92028
From: Betty Prue [mailto:hotrodbetty92082@yahoo.com]
Sent: Wednesday, September 30, 2015 4:26 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Betty Prue

Valley Center 92082
From: Gary W Nelson [mailto:gnelson@gnelson.com]
Sent: Wednesday, September 30, 2015 4:21 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: FW: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

My wife and I retired 4 years ago. We moved to our wonderful home in Circle R Estates that unfortunately is adjacent to the proposed LHR proposed development. We took all of our retirement housing monies to purchase a property at a bank sale, after looking for our perfect house for over 2 years. There was no disclosure that the pastoral private road (Mountain Ridge) would be hi-jacked and used by a developer who's only interest is making money. This is a private road only used by the less than 25 homes in this immediate area. LHR would make it a public road with hundreds of trips using it per day. This road is also our only means of ingress and egress on a daily basis and in the event of a wild fire. There is no honest means of a safe way of exiting on this road nor Circle R with is the primary means of exiting the area. It would be a disaster and possible death for many people who could be trapped here.

Every day that we sit on our patio and listen to the "quiet", we marvel at the peace and tranquility this area gives us. This would all be ruined by the proposed LHR development. We are not anti growth. We are pro smart growth in areas that can handle the effects of such growth. This area does not meet that criteria.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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Sincerely,

Gary W Nelson

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Sincerely,

Maureen Gupta

Bonsall 92003
From: Thomas D Camp [mailto:tcamp494@gmail.com]
Sent: Wednesday, September 30, 2015 4:30 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Thomas D Camp

Escondido 92026
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Sincerely,

margaret duganski

fallbrook 92028
From: Cox, Greg  
Sent: Thursday, October 01, 2015 12:40 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Debby Siebert [mailto:dsiebert874@gmail.com]  
Sent: Wednesday, September 30, 2015 4:29 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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Sincerely,

Debby Siebert
San Marcos 92069
From: Michael Karp [mailto:mkarp845@yahoo.com]
Sent: Wednesday, September 30, 2015 5:08 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Michael Karp

Valley Center 92082
From: George & Patti Gregoroff [mailto:ogregoroff@hotmail.com]
Sent: Wednesday, September 30, 2015 5:09 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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From: Darlene Dakovich [mailto:djdakovich@gmail.com]
Sent: Wednesday, September 30, 2015 5:20 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Sincerely,

Darlene Dakovich

Fallbrook 92028
From: James Horn [mailto:jlv2008@gmail.com]  
Sent: Wednesday, September 30, 2015 5:52 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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Sincerely,

James Horn

Valley Center 92082
From: Carey Kennedy [mailto:ckennedy4100@gmail.com]
Sent: Wednesday, September 30, 2015 5:52 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Carey Kennedy

Fallbrook 92028
From: Florence Griffis [mailto:flovango@gmail.com]
Sent: Wednesday, September 30, 2015 5:55 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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I have evacuated 3 times from wild fires in Valley Center and my current location. I pack up early and leave before official notice to do so. I am 82 years old and this gets harder each time. Imagine former city people faced with smoke and flames trying to get out - Chaos! Don't create an area with a wall of fire from which to escape. Having more people on the roads is not going to make it easier. Think!

Even one of the Planning Commissioners said if he lived in this area, he would not be in favor of it! (so why did he vote yes and let us all face disaster?)

Sincerely, Florence Griffis

Florence Griffis

Escondido 92026
From: Hans Haas [mailto:terik@gmail.com]
Sent: Wednesday, September 30, 2015 6:47 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

**Hans Haas**

Valley Center 92082
From: Greg and Christine Brady [mailto:cgbrady1959@yahoo.com]  
Sent: Wednesday, September 30, 2015 5:57 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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Greg and Christine Brady

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From: Lynn Horn [mailto:Lhvd2008@gmail.com]
Sent: Wednesday, September 30, 2015 5:57 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
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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 are the foundation of 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
From: Robert Marnett [mailto:marnett1@att.net]
Sent: Wednesday, September 30, 2015 7:47 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

I live one mile from the proposed development just off West Lilac. There is no way the narrow two lane roads to the proposed development could ever safely handle the traffic generated by 1600 residences. West Lilac to the city of Bonsall and Hwy 395 to Hwy 76 cannot be widened without a multi-million dollar effort that the builder is unwilling to pay for. I have already seen two deaths at the West Lilac and Hwy 395 intersection in the last 4 years from my back yard. That figure could easily quadruple with the LHR development and you will be directly responsible for those deaths.

Additionally, increased crime will inevitably result from a such a high density development.

And finally, I spent a long time finding the perfect place to retire away from LA and Orange counties where I previously lived. The LHR project will destroy the quiet rural life I tried so hard to find for my wife and myself.

Please reject the LHR development and keep the original zoning for those parcels.

Thank you,

Robert Marnett

Bonsall 92003
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission's recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Debra Mirr

Bonsall 92003
From: Diane O'Toole [mailto:dbotoole@yahoo.com]
Sent: Wednesday, September 30, 2015 9:29 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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Sincerely,

**Diane O'Toole**

Escondido 92026
From: Cox, Greg  
Sent: Thursday, October 01, 2015 12:50 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Rose Van Driessche [mailto:Rowzee@gmail.com]  
Sent: Wednesday, September 30, 2015 9:32 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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Sincerely,

Rose Van Driessche

Valley Center 92082
From: Johan Pettersen [mailto:yvanddo@aol.com]  
Sent: Wednesday, September 30, 2015 9:37 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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Sincerely,

**Johan Pettersen**

Fallbrook 92028
To the Honorable San Diego Board of Supervisors:

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Sincerely,

John Turner

Valley center 92083
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You Supervisors of SD County were elected, to represent constituents and families in your District. Voters in your District are asking you to show how your actions 'earn' interest on the promises every single Supervisor made during election campaigns. 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 are the foundation of the General Plan.

Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places. Thank you for thoughtful consideration of views of many, who find there is much to love about retaining 'rural' density, views, physical separation, and quality of life in Valley Center, without this new Village for Lilac Hills Ranch.

Sincerely,

patricia borchmann

escondido 92026
From: Mary Belton [mailto:beltoff1@gmail.com]
Sent: Wednesday, September 30, 2015 10:10 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Mary Belton

Fallbrook 92028
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Sincerely,

Melinda Sparks

fallbrook 92028
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Sincerely,

Lucinda Lawton

Valley Center 92082
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Sincerely,

Laura Glusha

Escondido 92025
To the Honorable San Diego Board of Supervisors:

I am heartsick and seriously concerned as I have watched the evolution of the Lilac Hills Ranch project develop. It is apparent that this project was orchestrated by Accretive Developers with the support of the Planning Commission staff and a number of the Planning Commission members. Why did the San Diego spend countless hours and millions of dollars on community general plans and a law that prohibits leapfrog development to a short time later amend general plans and use an "equivalent" loophole to approve the Lilac Hills Ranch development? It not only flies in the face of what is rational and conscionable, it makes a mockery of the process and the politicians that support this and similar developments.

San Diego County spent 13 years and $18.6 million to develop a General Plan that meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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The Applicant's Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved. I live on one of the two evacuation roads from Valley Center and the proposed Lilac Hills project. It is difficult to exit onto Circle R Drive now as it is. One can only imagine what it will be like with an additional 1700 homes a mile up the road, not to mention in an evacuation situation on a two-lane road with one land reserved for emergency vehicle use.

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 are the foundation of the General Plan.

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Sincerely,
From: Cox, Greg  
Sent: Thursday, October 01, 2015 1:01 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Karla Carroll [mailto:KarlaCarroll@outlook.com]  
Sent: Thursday, October 01, 2015 7:32 AM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
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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 are the foundation of the General Plan.

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

Sincerely,

Karla Carroll

El Cajon 92021
To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Kelly Metten

Kelly Metten

fallbrook 92028
To the Honorable San Diego Board of Supervisors:

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places. In addition, supervisors with a proximity to the proposed development having the appearance of a conflict of interest because of changes to their land values or other concerns, should recuse themselves from voting on said project’s approval.

Sincerely,

Lyn Townsend

Escondido 92026
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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Sincerely,
Susan L. Moore
Resident of Valley Center over 30 years.

Susan Moore
Valley Center 92082
From: Cox, Greg  
Sent: Thursday, October 01, 2015 1:13 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: jonathan heller [mailto:jmheller@msn.com]  
Sent: Thursday, October 01, 2015 10:44 AM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We cannot realistically build a new community without the resources to serve and protect such a community. There is no industry to count on, the lack of schools, water, fire control, traffic control, Hospitals, medical care, and safe development of services are the key reasons. Roads are not wide enough, traffic patterns will be difficult. Services such as grocery and all other services are limited in availability and expected growth of such services is neither guaranteed nor sustainable.

You cannot justify adding such density without an over whelming rationale, beyond the singular act of giving a developer the ability to see development. Developers move on the the next project and often times similar situation are not sustainable. There are many such examples up and down the California Valleys. I am thinking of similar development in the Central Valley and Las Vegas. The long term situation drives down housing value and drives up absentee ownership, with marginal investment return.

However the most critical limitation is natural resources. Where is the water to come from? Will there be something about these developments that assures water service and availability and infrastructure over time? How about green space, and how to maintain it? What about utility services and sustainability and safety? Where is the power going to come from?

We already have enough, more than enough extra capacity approved. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and 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,

jonathan heller

Valley Center 92082
From: Lee Schwarz [mailto:schwarzano@gmail.com]
Sent: Thursday, October 01, 2015 11:18 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Lee Schwarz

PS- No need to modify this letter in any way. It says it all

Lee Schwarz

Valley Center 92082
From: Cox, Greg  
Sent: Thursday, October 01, 2015 1:16 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Jim Schwarz [mailto:jim.r.schwarz@gmail.com]  
Sent: Thursday, October 01, 2015 11:19 AM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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Sincerely,

Jim Schwarz

Valley Center 92082
From: Patricia Fouquet [mailto:prfouquet@gmail.com]
Sent: Thursday, October 01, 2015 1:04 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Furthermore, in the event of a catastrophic fire, the evacuation of Lilac Hills Ranch, if it were built fully, would overwhelm the efforts to evacuate of all the people who live in the present rural areas to the west. The fire danger ALONE must be addressed if there is to be any further development up in this location. Roads adequate for evacuation must be built before any further homes are constructed up here!

Sincerely,

**Patricia Fouquet**

Bonsall 92003
To the Honorable San Diego Board of Supervisors:

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

The County needs to develop a Climate Action Plan that achieves climate-stabilizing targets with current zoning (if possible) and enforceable measures. With all the driving that this project would induce, it's approval would make it much harder to develop the CAP that is needed.

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Sincerely,

Michael Bullock

Oceanside 92054
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Sincerely,

Richard Belton

Fallbrook 92028
THIS PAGE IS INTENTIONALLY LEFT BLANK.
From: Cox, Greg
Sent: Monday, September 14, 2015 12:13 PM
To: FGG-DL, LSDOCS
Subject: FW: Lilac Hills Ranch Project

-----Original Message-----
From: Mike Seiler [mailto:m.seiler@cox.net]
Sent: Saturday, September 12, 2015 9:40 AM
To: Cox, Greg
Cc: De La Rosa, Michael
Subject: Lilac Hills Ranch Project

Greg,

I recommend that we meet and talk Monday, or at your earliest convenience, on the Lilac Hills Ranch project that passed the Planning Commission yesterday by a 4-3 vote. There are some issues that didn't make the news story in this morning's SD Union Tribune.

I can make myself available pretty much all morning and most of the afternoon Monday, Tuesday morning, Wednesday afternoon after 3 p.m., and Thursday, most of the day.

Sincerely,
Mike
From: Patrice Promack [mailto:ppromack@yahoo.com]
Sent: Thursday, September 17, 2015 8:46 PM
To: Cox, Greg
Subject: Lilac Hills

Hello Mr. Cox,
I live in the Deer Springs Oaks community and I have been following the Lilac Hills Ranch process. It was truly a shock to read that the Planning folks said okay for Lilac Hills Ranch.

The General Plan said you should put developments like Lilac Hills in areas where there is infrastructure: roads, sewer, water, etc. It identified smart growth areas and this project is so far outside of smart growth areas ... There is no transit. There is no place to get reasonable services.
There is little industry, which means that people living in Lilac Hills would have to commute to work on the I-5. This adds up to increased gridlock and higher greenhouse gas emissions from all those cars on the highway.

Let's stick to the plan and reject Lilac Hills Ranch. If the Supervisors allow this project to move forward by approving a General Plan Amendment, there are plenty more offenders waiting in the wings. The Supervisors should reject not only Lilac Hills Ranch but also Warner Ranch, Newland Sierra, San Marcos Highlands, Valiano and any other proposed development that plops down urban developments in remote locations.

Please do not vote to approve Lilac Hills. Keep the General Plan intact...it is the right thing to do!!

Thanks,
Patrice Promack
From: Lisa Cherico [mailto:lisac@klainc.com]
Sent: Wednesday, September 30, 2015 4:01 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

The developers want to build a "village destination", none of the residents who have already purchased homes, and paid taxes in this area want to live in a village, if we did we would have moved to Carlsbad or San Marcos. I personally purchased a home in Fallbrook for the RURAL lifestyle.

Additionally, the areas of Fallbrook and Valley Center already do not have enough water, power, roads, fire fighters etc. I do not understand how the board can approve a project of this magnitude, while at the same time the State is constantly telling residents we do not have enough resources for the existing homes.

Please consider the people in the area, and our quality of life. If this project is as the developers claim, good for the existing community, please ask them to put it on the ballot.

Sincerely
Lisa Cherico

Sincerely,

Lisa Cherico

Fallbrook 92028
To the Honorable San Diego Board of Supervisors:

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

The board of supervisors approved the current general plan and I see no reason to grant special favors & exemptions from this general plan.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs. As you are aware, building where there is no infrastructure just increases the cost of housing in order to provide the necessities of life. This will not make for "affordable" housing!

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a
hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.

The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Kristi Davis

Escondido 92026-5915
From: Cox, Greg  
Sent: Wednesday, September 30, 2015 4:05 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside 

From: Linda Camp [mailto:trailpaloma@yahoo.com]  
Sent: Wednesday, September 30, 2015 4:04 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside 

To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Linda Camp

escondido 92026
From: Darin Pines [mailto:darin@calplant.com]
Sent: Wednesday, September 30, 2015 4:06 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Darin Pines

Valley Center 92028
From: Cox, Greg
Sent: Thursday, October 01, 2015 11:04 AM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Karen Langer Baker [mailto:karenlangerbaker@gmail.com]
Sent: Wednesday, September 30, 2015 4:09 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Karen Langer Baker

Fallbrook 92028
THIS PAGE IS INTENTIONALLY LEFT BLANK.
To the San Diego Board of Supervisors:

We are writing to respectfully ask you to deny the Lilac Hills Ranch project for the following reasons:

Our family has lived in this area for 18 years and we enjoy the rural surroundings. Our belief has always been it would remain protected in some way due to the guidelines of the County General Plan. Now we find ourselves defending the very document that was created to stop this type of expansion.

While we understand the need for growth there is also the need to properly control that growth. Areas such as Lilac Hills fall completely outside of that plan. Building such a large scale development in an area that has nothing like this now will completely destroy it. This is NOT planned and controlled growth.

Lastly we as a family have a concern for our safety in the event of a wildfire. The Lilac bridge is only so wide and to the best of our knowledge can not easily be widened. During the last wildfires in the area West Lilac Rd was completely gridlocked. We can not imagine adding possibly 5000 or more people in the area and having anyone think we could evacuate safely.

Please follow the General Plan and put this project out of scope as it should be.

Thank you,

The Martino's

Gary Martino

Escondido 92026
From: Jennifer Lindley [mailto:jenniferlindley72@gmail.com]  
Sent: Wednesday, September 30, 2015 4:39 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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

Sincerely,

Jennifer Lindley

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

I am writing to respectfully ask you to deny the Lilac Hills Ranch (LHR) project for the following reasons: We have a general plan that needs to be followed. Look to the Sprinter corridor in San Marcos, with housing being developed along transportation lines. We need to develop more transit opportunities and follow that with housing.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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Sincerely,

Kathe Robbins
San Marcos 92069
From: Hal Helfand [mailto:hhelfand@gmail.com]
Sent: Wednesday, September 30, 2015 4:28 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

The traffic on our current roads are HORRENDOUS NOW! I can't imagine how long the lines will be coming down Circle R Drive to Highway 395. The current wait during the week is between 10 and 30 cars. What will it be like with more homes here! Even with a traffic light it will be a very crowded condition. It is easy for someone not living here to think all is well. I ask each of the Supervisors to come out here and stand at the Fire Station at Circle R Drive at 7:00 am to 8:00am and see what it is like. You may think you are too busy, but your vote is important and your valuable time will be well served to spend just one hour seeing what we see every day. PLEASE!

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

Also, ignoring the general plan, in this instance, is UNNECESSARY. There is adequate land available in the county to satisfy all the growth needed. Isn't that why you had a General Plan in the first place!

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

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

Sincerely,

Hal Helfand

Escondido 92026
From: Alan Miller [mailto:Alanmillercabinets@gmail.com]
Sent: Wednesday, September 30, 2015 4:22 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Alan Miller

Bonsall 92003
From: Linda M Nelson [mailto:linda@qlnelson.com]
Sent: Wednesday, September 30, 2015 4:17 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

My husband and I retired 4 years ago. We moved to our wonderful home in Circle R Estates that unfortunately is adjacent to the proposed LHR proposed development. We took all of our retirement housing monies to purchase a property at a bank sale, after looking for our perfect house for over 2 years. There was no disclosure that the pastoral private road (Mountain Ridge) would be hi-jacked and used by a developer who's only interest is making money. This is a private road only used by the less than 25 homes in this immediate area. LHR would make it a public road with hundreds of trips using it per day. This road is also our only means of ingress and egress on a daily basis and in the event of a wild fire. There is no honest means of a safe way of exiting on this road nor Circle R with is the primary means of exiting the area. It would be a disaster and possible death for many people who could be trapped here.

Every day that we sit on our patio and listen to the "quiet", we marvel at the peace and tranquility this area gives us.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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Sincerely,

Linda M Nelson

Escondido 92026
From: Dan Dakovich [mailto:dddakovich@gmail.com]
Sent: Wednesday, September 30, 2015 4:20 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Dan Dakovich

Fallbrook 92028
From: Betty Prue [mailto:hotrodbetty92082@yahoo.com]
Sent: Wednesday, September 30, 2015 4:26 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

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Sincerely,

Betty Prue

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

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

My wife and I retired 4 years ago. We moved to our wonderful home in Circle R Estates that unfortunately is adjacent to the proposed LHR proposed development. We took all of our retirement housing monies to purchase a property at a bank sale, after looking for our perfect house for over 2 years. There was no disclosure that the pastoral private road (Mountain Ridge) would be hi-jacked and used by a developer who's only interest is making money. This is a private road only used by the less than 25 homes in this immediate area. LHR would make it a public road with hundreds of trips using it per day. This road is also our only means of ingress and egress on a daily basis and in the event of a wild fire. There is no honest means of a safe way of exiting on this road nor Circle R with is the primary means of exiting the area. It would be a disaster and possible death for many people who could be trapped here.

Every day that we sit on our patio and listen to the "quiet", we marvel at the peace and tranquility this area gives us. This would all be ruined by the proposed LHR development. We are not anti growth. We are pro smart growth in areas that can handle the effects of such growth. This area does not meet that criteria.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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Sincerely,

**Gary W Nelson**

Escondido 92026
From: Maureen Gupta [mailto:maureen.gupta@gmail.com]
Sent: Wednesday, September 30, 2015 4:11 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Maureen Gupta

Bonsall 92003
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Sincerely,

Thomas D Camp

Escondido 92026
From: margaret duganski [mailto:mduganski@gmail.com]
Sent: Wednesday, September 30, 2015 4:11 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

margaret duganski

fallbrook 92028
From: Debby Siebert [mailto:dsiebert874@gmail.com]
Sent: Wednesday, September 30, 2015 4:29 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Sincerely,

Debby Siebert
San Marcos 92069
From: Michael Karp [mailto:mkarp845@yahoo.com]
Sent: Wednesday, September 30, 2015 5:08 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Sincerely,

Michael Karp

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

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Sincerely,

**Darlene Dakovich**

Fallbrook 92028
From: James Horn [mailto:jivc2008@gmail.com]
Sent: Wednesday, September 30, 2015 5:52 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

James Horn

Valley Center 92082
From: Carey Kennedy [mailto:ckennedy4100@gmail.com]
Sent: Wednesday, September 30, 2015 5:52 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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Carey Kennedy

Fallbrook 92028
From: Florence Griffis [mailto:flovango@gmail.com]  
Sent: Wednesday, September 30, 2015 5:55 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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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 are the foundation of the General Plan.

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

I have evacuated 3 times from wild fires in Valley Center and my current location. I pack up early and leave before official notice to do so. I am 82 years old and this gets harder each time. Imagine former city people faced with smoke and flames trying to get out - Chaos! Don't create an area with a wall of fire from which to escape. Having more people on the roads is not going to make it easier. Think!

Even one of the Planning Commissioners said if he lived in this area, he would not be in favor of it! (so why did he vote yes and let us all face disaster?)

Sincerely, Florence Griffis

Florence Griffis

Escondido 92026
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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Sincerely,

Hans Haas

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Greg and Christine Brady

Escondido 92026
From: Lynn Horn [mailto:Lhvd2008@gmail.com]
Sent: Wednesday, September 30, 2015 5:57 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Lynn Horn

Valley Center 92082
From: Cox, Greg  
Sent: Thursday, October 01, 2015 12:48 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Robert Marnett [mailto:marnett1@att.net]  
Sent: Wednesday, September 30, 2015 7:47 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

I live one mile from the proposed development just off West Lilac. There is no way the narrow two lane roads to the proposed development could ever safely handle the traffic generated by 1600 residences. West Lilac to the city of Bonsall and Hwy 395 to Hwy 76 cannot be widened without a multi-million dollar effort that the builder is unwilling to pay for. I have already seen two deaths at the West Lilac and Hwy 395 intersection in the last 4 years from my back yard. That figure could easily quadruple with the LHR development and you will be directly responsible for those deaths.

Additionally, increased crime will inevitably result from a such a high density development.

And finally, I spent a long time finding the perfect place to retire away from LA and Orange counties where I previously lived. The LHR project will destroy the quiet rural life I tried so hard to find for my wife and myself.

Please reject the LHR development and keep the original zoning for those parcels.

Thank you,

Robert Marnett

Bonsall 92003
From: Debra Mirr [mailto:debramirr@gmail.com]
Sent: Wednesday, September 30, 2015 8:53 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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Sincerely,

Debra Mirr

Bonsall 92003
To the Honorable San Diego Board of Supervisors:

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Sincerely,

**Diane O'Toole**

Escondido 92026
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Sincerely,

Rose Van Driessche

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Johan Pettersen

Fallbrook 92028
To the Honorable San Diego Board of Supervisors:

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Sincerely,

John Turner

Valley center 92083
From: patricia borchmann [mailto:patriciaborchmann@gmail.com]
Sent: Wednesday, September 30, 2015 9:47 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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You Supervisors of SD County were elected, to represent constituents and families in your District. Voters in your District are asking you to show how your actions 'earn' interest on the promises every single Supervisor made during election campaigns. 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 are the foundation of the General Plan.

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Thank you for thoughtful consideration of views of many, who find there is much to love about retaining 'rural' density, views, physical separation, and quality of life in Valley Center, without this new Village for Lilac Hills Ranch.

Sincerely,

patricia borchmann

escondido 92026
To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Mary Belton

Fallbrook 92028
From: Melinda Sparks [mailto:melindamrowe@gmail.com]
Sent: Wednesday, September 30, 2015 10:25 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Melinda Sparks

fallbrook 92028
From: Lucinda Lawton [mailto: lucinda.lawton@gmail.com]
Sent: Wednesday, September 30, 2015 10:39 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Lucinda Lawton

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Laura Glusha

Escondido 92025
From: Elizabeth Aragon [mailto:elizabmarie@hotmail.com]
Sent: Thursday, October 01, 2015 12:43 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

I am heartsick and seriously concerned as I have watched the evolution of the Lilac Hills Ranch project develop. It is apparent that this project was orchestrated by Accretive Developers with the support of the Planning Commission staff and a number of the Planning Commission members. Why did the San Diego spend countless hours and millions of dollars on community general plans and a law that prohibits leapfrog development to a short time later amend general plans and use an "equivalent" loophole to approve the Lilac Hills Ranch development? It not only flies in the face of what is rational and conscionable, it makes a mockery of the process and the politicians that support this and similar developments.

San Diego County spent 13 years and $18.6 million to develop a General Plan that meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved. I live on one of the two evacuation roads from Valley Center and the proposed Lilac Hills project. It is difficult to exit onto Circle R Drive now as it is. One can only imagine what it will be like with an additional 1700 homes a mile up the road, not to mention in an evacuation situation on a two-lane road with one land reserved for emergency vehicle use.

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Sincerely,
Elizabeth Aragon
Escondido 92026
From: Karla Carroll [mailto:KarlaCarroll@outlook.com]
Sent: Thursday, October 01, 2015 7:32 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Karla Carroll

El Cajon 92021
From: Kelly Metten [mailto:kellymetten@sbcglobal.net]
Sent: Thursday, October 01, 2015 7:37 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Kelly Metten

Kelly Metten

fallbrook 92028
From: Cox, Greg  
Sent: Thursday, October 01, 2015 1:05 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Lyn Townsend [mailto:lynntownsend@gmail.com]  
Sent: Thursday, October 01, 2015 9:13 AM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places. In addition, supervisors with a proximity to the proposed development having the appearance of a conflict of interest because of changes to their land values or other concerns, should recuse themselves from voting on said project's approval.

Sincerely,

Lyn Townsend

Escondido 92026
To the Honorable San Diego Board of Supervisors:

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Sincerely,
Susan L. Moore
Resident of Valley Center over 30 years.

Susan Moore
Valley Center 92082
From: Cox, Greg  
Sent: Thursday, October 01, 2015 1:13 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: jonathan heller [mailto:jmheller@msn.com]  
Sent: Thursday, October 01, 2015 10:44 AM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We cannot realistically build a new community without the resources to serve and protect such a community. There is no industry to count on, the lack of schools, water, fire control, traffic control, Hospitals, medical care, and safe development of services are the key reasons. Roads are not wide enough, traffic patterns will be difficult. Services such as grocery and all other services are limited in availability and expected growth of such services is neither guaranteed nor sustainable.

You cannot justify adding such density without an over whelming rationale, beyond the singular act of giving a developer the ability to see development. Developers move on the the next project and often times similar situation are not sustainable. There are many such examples up and down the California Valleys. I am thinking of similar development in the Central Valley and Las Vegas. The long term situation drives down housing value and drives up absentee ownership, with marginal investment return.

However the most critical limitation is natural resources. Where is the water to come from? Will there be something about these developments that assures water service and availability and infrastructure over time? How about green space, and how to maintain it? What about utility services and sustainability and safety? Where is the power going to come from?

We already have enough, more than enough extra capacity approved. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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Sincerely,

jonathan heller

Valley Center 92082
From: Lee Schwarz [mailto:schwarzano@gmail.com]
Sent: Thursday, October 01, 2015 11:18 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Lee Schwarz

PS- No need to modify this letter in any way. It says it all

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Furthermore, in the event of a catastrophic fire, the evacuation of Lilac Hills Ranch, if it were built fully, would overwhelm the efforts to evacuate of all the people who live in the present rural areas to the west. The fire danger ALONE must be addressed if there is to be any further development up in this location. Roads adequate for evacuation must be built before any further homes are constructed up here!

Sincerely,

Patricia Fouquet

Bonsall 92003
From: Michael Bullock [mailto:mike_bullock@earthlink.net]
Sent: Thursday, October 01, 2015 1:05 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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

The County needs to develop a Climate Action Plan that achieves climate-stabilizing targets with current zoning (if possible) and enforceable measures. With all the driving that this project would induce, it's approval would make it much harder to develop the CAP that is needed.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.
Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.

The Planning Commission's recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Michael Bullock

Oceanside 92054
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Richard Belton

Fallbrook 92028
ATTACHMENT

For Lilac Hills Ranch

Wednesday,
September 30, 2015

PUBLIC COMMUNICATION RECEIVED BY THE CLERK OF THE BOARD

Distributed: 10/2/15
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Sincerely,

Katherine Fontenot

Escondido 92026
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It is irresponsible to approve exceptions to the General Plan when you have not even come up with a Climate Change Plan. Increasing road traffic and water consumption is foolish.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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Sincerely,

Joy Frew

Fallbrook 92028
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Sincerely,

Michele Glemser

Fallbrook 92028
From: Gregory MIRR [mailto:GREGMIRR@GMAIL.COM]
Sent: Thursday, October 01, 2015 2:59 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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Sincerely,

Gregory MIrre

BONSALL 92003
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In closing, in respect to those "voices" from other San Diegans that this project would not affect, they are only concerned with convenience. Convenience of nearer markets, amenities, etc. Their self fulfilling opinions should not be given any credence when making the decision for our community.

Sincerely,

Jeff Johnson

jeff johnson

VC 92026
From: Peter Penseyres [mailto:avofarmer2000@yahoo.com]
Sent: Thursday, October 01, 2015 3:36 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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

Sincerely,

Peter Penseyres

**Peter Penseyres**

Oceanside 90257
For the record

Sent from my iPhone

Begin forwarded message:

From: Suzanne Martindale <edsuem@gmail.com>
Date: October 2, 2015 at 10:25:01 AM PDT
To: <greg.cox@sdcounty.ca.gov>, <michael.delarosa@sdcounty.ca.gov>,
<dianne.jacob@sdcounty.ca.gov>, <adam.wilson@sdcounty.ca.gov>,
<dave.roberts@sdcounty.ca.gov>, <keith.corry@sdcounty.ca.gov>,
<ron.roberts@sdcounty.ca.gov>, <victor.avina@sdcounty.ca.gov>,
<bill.horn@sdcounty.ca.gov>, <christopher.livoni@sdcounty.ca.gov>
Subject: Save Our San Diego Countryside

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Sincerely,

Suzanne Martindale

Valley Center 92082
For the record

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From: Suzanne Martindale <edsuem@gmail.com>
Date: October 2, 2015 at 10:25:01 AM PDT
To: <greg.cox@sdcounty.ca.gov>, <michael.delarosa@sdcounty.ca.gov>,
<dianne.jacob@sdcounty.ca.gov>, <adam.wilson@sdcounty.ca.gov>,
<dale.roberts@sdcounty.ca.gov>, <keith.corry@sdcounty.ca.gov>,
<ron.roberts@sdcounty.ca.gov>, <victor.avina@sdcounty.ca.gov>,
<bill.horn@sdcounty.ca.gov>, <christopher.livoni@sdcounty.ca.gov>
Subject: Save Our San Diego Countryside

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Sincerely,

Suzanne Martindale

Valley Center 92082
From: anne marie nelson [mailto:annemarien@wildblue.net]
Sent: Thursday, October 01, 2015 5:23 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

anne marie nelson

valley center 92082
From: Suzi Sandore [mailto:hikersuzi@hotmail.com]
Sent: Thursday, October 01, 2015 8:41 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
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We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Tonya Saliba

Fallbrook 92028
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Sincerely,

Eric DeMasi

Fallbrook, Ca. (2028)
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Build village densities in established Villages. DENY General Plan Amendments that drop urban islands into rural places.

Sincerely,

Carolyn Kurtz

Valley Center 92082
From: Suzanne Martindale [mailto:edsuem@gmail.com]
Sent: Friday, October 02, 2015 10:25 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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Sincerely,

Suzanne Martindale

Valley Center 92082
From: Colin Kurtz [mailto:Permanentmidnight@hotmail.com]
Sent: Friday, October 02, 2015 10:28 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

I am writing to ask that you deny the Lilac Hills Ranch (LHR) project for the following reasons, because it is such a violation of the planning guidelines that took so much work, money and time to establish. This project makes a mockery of democracy. Money wins the Board of Supervisors is what we all will learn if you pass this.

Colin Kurtz

Valley Center 92082
From: Tammy Granados [mailto:ragtag@vcweb.org]
Sent: Friday, October 02, 2015 2:31 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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

Sincerely,

Tammy Granados

Valley Center 92082
For the record

From: Tammy Granados [mailto:ragtag@vcweb.org]
Sent: Friday, October 02, 2015 2:31 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Tammy Granados

Valley Center 92082
For the record

From: [mailto:lettapasta@gmail.com]
Sent: Friday, October 02, 2015 4:45 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Eric DeMasi

Fallbrook, Ca. (2028)
For the record

From: Tonya Saliba [mailto:TSalivaRn@gmail.com]
Sent: Thursday, October 01, 2015 9:28 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Tonya Saliba

Fallbrook 92028
For the record

From: anne marie nelson [mailto:annemarien@wildblue.net]
Sent: Thursday, October 01, 2015 5:23 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

anne marie nelson

valley center 92082
From: Cox, Greg
Sent: Monday, October 05, 2015 12:50 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Leon Schwartz [mailto:vcleon1@yahoo.com]
Sent: Friday, October 02, 2015 8:00 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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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 are the foundation of the General Plan. I worked for years on GP 2020 and other plans with the County and strongly believe that the County should not allow any modifications at this time to the General Plan. If they did other developments would also ask.

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

Sincerely,

Leon Schwartz

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

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

The 2011 GENERAL PLAN accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements. We should not destroy farm land for more housing.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and 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 are the foundation of the GENERAL PLAN.

PLEASE: Build village densities in established Villages. UPHOLD THE GENERAL PLAN.

Sincerely,

Sue Janisch
susan janisch

valley center 92082
From: Cox, Greg  
Sent: Monday, October 05, 2015 12:52 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Nancy Wright [mailto:harborview760@gmail.com]  
Sent: Saturday, October 03, 2015 8:59 AM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
WHERE ARE YOU GETTING THE WATER FOR THIS HUGE DEVELOPMENT.

The Planning Commission's recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Nancy Wright

FALLBROOK 92028
From: Rena Hamilton [mailto:avorena1@yahoo.com]
Sent: Saturday, October 03, 2015 9:06 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

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

Sincerely,

**Rena Hamilton**

Valley Center 92082
To the Honorable San Diego Board of Supervisors:

Where is all the water coming from?

Traffic is already bad.

How many more schools will be needed?

Sincerely,

Barbara Zink

Bonsall 92003
From: Cox, Greg
Sent: Monday, October 05, 2015 12:59 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: karenlee Robinson [mailto:klrobinson@cox.net]
Sent: Saturday, October 03, 2015 2:06 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

karenlee Robinson

San Diego 92107
From: Lisa Taunt [mailto:pdnhed@gmail.com]
Sent: Saturday, October 03, 2015 9:51 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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Sincerely,

Lisa Taunt

Fallbrook 92028
From: Kathy Hodge [mailto:kathleenhodge64@gmail.com]
Sent: Saturday, October 03, 2015 11:34 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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The proposed project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. This project is a hazard to public safety and should not be approved since a fire driven by Santa Ana winds would be able to destroy the area in one hour.

Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements..

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Sincerely,

Kathy Hodge

Escondido 92026
From: Jan Shuttleworth [mailto:jsiredog@live.com]
Sent: Sunday, October 04, 2015 7:38 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

I am a retired Firefighter from San Diego City and have a huge concern regarding fire service if this project goes in.
The current fire stations in this area are spread thin as it is. If or should I say when a major fire rolls through this area it will be very difficult to evacuate the residents that live here now with the roads the way they are. Their proposed "road improvements" will not help this situation. Adding these new dwellings, vehicles and people with this proposed project will complicate the above scenario. This is not the area for this proposed plan. I truly believe this could result in tragic loss of life in a major fire evacuation situation. It is your responsibility to insure safety for all in this area, I wouldn't want to be in your shoes if lives are lost as a result of approving this project.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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Sincerely,

Jan Shuttleworth

Escondido 92026
From: Elisabeth Gruwell [mailto:sublimesbetfan@aol.com]
Sent: Sunday, October 04, 2015 10:19 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Elisabeth Gruwell

Valley Cetner 92082
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Chad Gruwell

Valley Center, 92082
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Sincerely,
Laura P. Martino
West Lilac Road Homeowner since 1997

Laura Martino

Escondido 92026
From: Victoria Laurie [mailto:aardvarksyl@gmail.com]
Sent: Sunday, October 04, 2015 11:12 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Victoria Laurie

valley center 92082
From: Ann Howard [mailto:cannhoward@aol.com]
Sent: Sunday, October 04, 2015 1:10 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

Deny Lilac Hills Ranch! It will be a disaster...do you want this as your legacy? The communities affected by this betrayal of trust that North County residents have in our officials will not be forgotten.

Goodson is a liar, none of his promises will happen, or it will take decades to fulfill with other's capital. Those who have spoken in favor of this project have some monetary gain connected to it. This is not fair to existing residents of the community, punishing them for the benefit of a developer, who has a bad reputation.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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Sincerely,

Ann Howard

Valley Center 92082
From: Debbie Groyer [mailto:debmona28@yahoo.com]
Sent: Sunday, October 04, 2015 2:06 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

I am writing to respectfully ask you to deny the Lilac Hills Ranch (LHR) project for the following reasons as well as the fact that, as a resident of the area in question and being familiar with the roads, it is unbelievable to me that such a dangerous idea is even been entertained. Anyone who knows the area is aware that putting in a project of this nature is inviting disaster.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

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Sincerely,

Debbie Groyer

Escondido 92026
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Tyler Alvarez

Vista 92084
ATTACHMENT

For Lilac Hills Ranch

Wednesday,
October 28, 2015

PUBLIC COMMUNICATION RECEIVED BY THE CLERK OF THE BOARD

Distributed: 10/08/15
From: Cox, Greg
Sent: Tuesday, October 06, 2015 10:08 AM
To: FGG-DL, LSDOCS
Subject: FW: Lilac Hills - please vote NO

-----Original Message-----
From: louobermeyer@gmail.com [mailto:louobermeyer@gmail.com]
Sent: Monday, October 05, 2015 8:04 AM
To: Cox, Greg
Subject: Lilac Hills - please vote NO

Below was submitted to greg.cox@sdcounty.ca.gov From louobermeyer@gmail.com On 10/5/2015 AT 8:03:32 AM

Name: Lou Obermeyer

Address: 3351 Holly Oak Lane

Email Address: louobermeyer@gmail.com

Subject: Lilac Hills - please vote NO

Comments:

Dear Supervisor Cox,

The Lilac Hills development will bring many unnecessary problems to a beautiful rural area. The 15 is already stop and go for commuters (which I have to endure daily). The only "winners" if the development is approved will be Accretive and Supervisor Horn (who will laugh all the way to the bank). Please vote NO on the massive development.

Thank you,
Lou Obermeyer
From: Addie Brassard [mailto:addiebrassard@gmail.com]
Sent: Tuesday, October 06, 2015 11:42 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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Sincerely,

Addie Brassard

Bonsall CA 92003
To the Honorable San Diego Board of Supervisors:

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Sincerely,

Jean White

Fallbrook 92028
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Please leave our little town alone!

Sincerely,

Anna Di Nardo

Anna Di Nardo

Pauma Valley 92061
Copy of Communication received for Lilac Hills Dev.

From: BOS@SDCOUNTY.CA.GOV [mailto:BOS@SDCOUNTY.CA.GOV]
Sent: Wednesday, October 07, 2015 4:07 PM
To: De La Rosa, Michael
Subject: Attached Image
September 25, 2015

Supervisor Greg Cox  
COUNTY ADMINISTRATION CENTER  
1600 Pacific Highway, Room 335  
San Diego, CA 92101  

Re: Proposed Lilac Hills Development  

Dear Supervisor Cox:  

We are enclosing a copy of a heart-wrenching letter written to The Times-Advocate newspaper by the Roach family concerning the death of their daughter Ashleigh Roach.  

As you consider the proposed Lilac Hills Development, we ask that you take into account what the Roach family suffered as a result of insufficient evacuation planning during an inevitable wildfire. With the size of this development, an evacuation would be chaos and, surely, lives would be lost.  

Please, please do not put us and our neighbors in harm’s way.  

Sincerely,  

[Signature]  
Darlene Hare  

Ben and Darlene Hare  
9902 West Lilac Road  
Escondido, CA 92026  

(760) 749-6253  

Enc.: Letter to the Editor
WE ARE NOT AGAINST MANAGED GROWTH

Editor, Times Advocate:

Excerpt from the Fire Evacuation Plan for Lilac Hills Development Revised June 1, 2015

"Further, and of extreme importance, it is imperative that all of the residents make the decision to evacuate as soon as possible as the roadway limitations within and adjacent to the development could require more than two hours to complete the evacuation process based on nationally recognized road capacity standards and competing use of the roads by residents from other areas."

In October 2003, San Diego County experienced severe wild fires (Cedar Fire & Paradise Fire). The majority of the people killed in these two fires, (including my 16 year old daughter Ashleigh Roach) died in their vehicles or in the process of running from the fires. The unpredictability of these fires created such a hazard that the planning the residents had in place was not sufficient to prevent such loss of life.

In our family's case we made most of the same preparations outlined in the above referenced "Lilac Hills Fire Evacuation Plan" (Ready-Set-Go), which were not sufficient for the Paradise Fire. The problem with the plan in my opinion is that it is based on a typical "wild land" fire without wind, where clearing the recommended area around the homes and using fire resistant building materials would give the Fire Fighters the edge they need to protect life and property. However now you're planning a community with a potential of 5000 new residents without adequate consideration of an evacuation plan that would prevent loss of life.

No we are not fire fighters and we are not against managed growth, however we have seen firsthand what happens during a disaster. We do not support a plan that puts unsuspecting people in harm's way.

By the admission in the report that it could take "up to two hours to evacuate all the residence of Lilac Hills", it is ridiculous to me that the County would even consider a development like this in the backcountry of San Diego, without adequate escape routes that would allow the residence to evacuate WHEN we have another wind driven fire like the Paradise or Cedar fires.
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Sincerely,

janet crawford

Bonsall 92003
From: Ann Brassard [mailto:annbrassard@att.net]
Sent: Thursday, October 08, 2015 8:59 AM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Ann Brassard

Bonsall 92003
From: Cox, Greg  
Sent: Thursday, October 08, 2015 4:18 PM  
To: FGG-DL LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: karen Koppenahver [mailto:karenkafi@aol.com]  
Sent: Thursday, October 08, 2015 2:32 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
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Sincerely,

karen Koppenahver

Fallbrook 92028
From: Steve Sevigny [mailto:sevigny59@yahoo.com]
Sent: Thursday, October 08, 2015 2:32 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

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Sincerely,

Steve Sevigny

FALLBROOK 920288820
From: Cox, Greg  
Sent: Thursday, October 08, 2015 4:18 PM  
To: FGG-DL, LSDOCS  
Subject: FW: Save Our San Diego Countryside

From: Isabella sevigny [mailto:isellasevigny@aol.com]  
Sent: Thursday, October 08, 2015 2:33 PM  
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher  
Subject: Save Our San Diego Countryside

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Sincerely,

Isabella sevigny

Fallbrook 92028
ATTACHMENT

For Lilac Hills Ranch

Wednesday,
October 28, 2015

PUBLIC COMMUNICATION RECEIVED BY THE CLERK OF THE BOARD

Distributed: 10/09/15
From: Cox, Greg
Sent: Friday, October 09, 2015 11:01 AM
To: FGG-DL, LSOCS
Subject: FW: Lilac Hills project

-----Original Message-----
From: pattyvonnormann@yahoo.com [mailto:pattyvonnormann@yahoo.com]
Sent: Wednesday, October 07, 2015 7:50 PM
To: Cox, Greg
Subject: Lilac Hills project

Below was submitted to greg.cox@sdcouuty.ca.gov From pattyvonnormann@yahoo.com On 10/7/2015 AT 7:50:25 PM

Name: Patricia Von Normann

Address: Valley Center, CA

Email Address: pattyvonnormann@yahoo.com

Subject: Lilac Hills project

Comments:

Hi,
I am against the proposed Lilac Hills housing development in Valley Center near the 15. This is the wrong project for the area. It will go against the current codes for the area and would need an amendment for it to be approved. Once we allow this development, this will cause an influx of more traffic, fire hazard, water is a precious resource which we don't have enough of and will give way to future developments with no regard for the rural atmosphere in Valley Center. It is not a smart move for Valley Center. Please vote No.
Patricia Von Normann
To the Honorable San Diego Board of Supervisors:

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

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

Approving Lilac Hills Ranch will NOT add to the County’s supply of moderately-priced housing. The high cost of bringing basic urban infrastructure to this remote location will be passed on to buyers and renters. High housing costs combined with costs of commuting long distances for work, school, and shopping make Lilac Hills Ranch a poor choice for housing, affordable or otherwise.

We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs.

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

Even if the Planning Commission’s recommended Conditions of Development are imposed by the Board, the project has substandard roads, inadequate legal rights for project use of private secondary access roads, and generates traffic that overwhelms the regional network of single lane rural roads.

The Applicant’s Consultants state in fine print that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind driven fire will burn through the project in an hour. This project is a hazard to public safety and should not be approved. Please DO NOT put our lives at risk by approving this project. Mr. Horn, I do not know what your motivation is to approve this project, but you could get caught in the inevitable chaos of a possible evacuation effort as well as the rest of us. Make a decision that is responsible to your constituents, not in favor of a developer. You have a responsibility to the tax paying citizens of San Diego County and Valley Center to recuse yourself from this vote because of an obvious conflict of interest.
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Even if the Planning Commission recommendations are approved, the development of Lilac Hills Ranch still requires the direct taking of land from six unwilling private property owners by the County to construct offsite road improvements.
The Planning Commission’s recommended Conditions of Development regarding project legal rights for use of private secondary access roads places the financial burden of fair adjudication of rights directly on private property owners. The proposed Condition requires owners to sue for a court ruling at their own expense. A vote for this project is a vote against public due process for the sole financial benefit of a hedge fund.

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 are the foundation of the General Plan.

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

Sincerely,

Marlene Pompetti

Escondido 92026
To the Honorable San Diego Board of Supervisors:

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

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Sincerely,

Dan Miller

El Cajon 92022
Dear Supervisor Cox,

As an elected representative, you are charged with representing the will of the people of San Diego County, who have already spoken loudly and clearly on the Lilac Hills Project via the General Plan Update which San Diego County spent 13 years and $18.6 million to develop. Via that plan, your constituents very clearly said “No” to building dense housing in rural areas; and said “No” to leapfrog development such as this project which is essentially creating an entirely new city in North County. In fact, this project flouts just about every major principle in the General Plan regarding back-country development.

In addition to the views already clearly expressed by your constituents -- i.e., the thousands of business and property owners, developers, and residents who reached agreement in the General Plan Update -- which you cannot ignore, this project has other serious problems that make its approval untenable, including:

1. We do not need this housing. We do not need to destroy farmland for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements. In Valley Center alone, 6,400 new dwellings are planned. 2,500-3,000 of these will be built at Village densities and priced in the $300K-$500K range.

2. Severe health and safety concerns alone make this project a non-starter, especially now. First, in the midst of an historic drought, only the foolhardy would approve building any more homes anywhere, especially in Valley Center which is now burdened with draconian water use reduction quotas. We are now living beyond our water means; adding more residents is shockingly irresponsible -- unless and until we have excess water to devote to them. Second, the drought only increases an already enormous fire risk. This project is in a high fire danger area -- where the fire risk is now exacerbated by the drought -- and where our fire fighters now struggle to respond in a timely manner to the threats to already-existing homes and residents. The Applicant’s own consultants state that Lilac Hills Ranch will take two hours to evacuate. Fire modeling indicates that a Santa Ana wind-driven fire will burn through the project in an hour. In addition, the roads cannot accommodate a mass exodus of this many additional residents. The risk of extensive property damage and even deaths is extremely high with this proposal. These severe health and safety concerns represent a liability that no County official should countenance.

3. This project’s problems are both severe and insurmountable. Forever ruining over 600 acres of farmland; adding many thousands of new residents and their perpetual water consumption; increasing the human and structure density in a wildfire-prone area; ignoring the basic premises of the General Plan; and creating a new city, far from...
support services are just a few of the severe negative impacts that are inherent in this project. The only mitigation available for these negative impacts is denial of the project.

Your vote must represent the views of those you are elected to represent. Thus, you must respect the general Plan Update and reject the Lilac Hills Project and ensure that medium/high density is only allowed in established Villages. DENY any General Plan Amendment that drops urban islands into rural places, including the Lilac Hills Project.

Sincerely,
MCraggs
Valley Center CA
To the Honorable San Diego Board of Supervisors:

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

Sincerely,

nancy maples

Carlsbad 92011
August 29, 2015

Supervisor Bill Horn
325 S. Melrose Ave. #5200
Vista, CA 92081

Dear Supervisor Horn,

I need your help on three things:

- I need a copy of the General Plan as it applies to North County (preferably electronically)
- In whatever form it exists, a copy of the District 5 Climate Action Plan or if it is a part of a county plan, that plan. If you have any sort of document of your actions on climate action, would you send them to me as well?
- Your help in assisting me in the development of a matrix showing all housing developments in North County either under construction, planned or proposed, whether on unincorporated land or not. You can help me by pointing me to the resource office in the county government that has all this information.

What I am trying to do is create a LIST of developments by name, principals involved, acreage involved, units planned or proposed, status and whether it requires or required an amendment to the general plan. The development can be either on incorporated or unincorporated land.

I have this list so far: Lilac, Newland, a Fallbrook development, Rancho del Oro Oceanside, Academy Oceanside, Meadowood, Campus Park (2), Warner Ranch, Safari Highlands, Eden Valley, Harmony Grove (2), Horse Ranch Ridge, and Town Square. Is this the total for under construction, planned and proposed?

I am also interested in what REQUIREMENTS, if any, are used to generate a need for these developments.

Thank you.

John Watson
Box 2768
Fallbrook, CA 92088
geospace@pacbell.net
June 11, 2020

Mark Slovick
Planning & Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE: Current Status of Fire Services Agreement for Lilac Hills Ranch

Mr. Slovick,

The Deer Springs Fire Protection District has not reached a Service Agreement with the Lilac Hills Ranch applicant. The last communication on this topic between the District and the applicant was in March, 2019. As stated in the District’s July 28, 2014, response letter to the Draft Environmental Impact Report, the District maintains its intent to serve the project.

Additionally, after reviewing letters to the applicant by San Diego County Fire Authority on January 8, 2020, and Planning & Development Services on May 6, 2020, the District supports the requirement for fuel modification easements along West Lilac Road. Without the easements, the District would be restricted in its ability to enforce the necessary clearance along the planned evacuation route. The 2018 California wildfires have reminded us all that well-maintained evacuation routes are a critical mitigation to entrapment, while also increasing the overall safety of residents.

If you have any questions, please feel free to contact me at (760) 749-8001.

Sincerely,

Bret A. Sealey
President
From: Avina, Victor
Sent: Friday, October 23, 2015 3:29 PM
To: FGG-DL, LSDOCS
Subject: FW: Save Our San Diego Countryside

From: Kristi Davis [mailto:jksales@hotmail.com]
Sent: Wednesday, September 30, 2015 4:03 PM
To: Cox, Greg; De La Rosa, Michael; Jacob, Dianne; Wilson, Adam; Roberts, Dave; Corry, Keith; Roberts, Ron; Avina, Victor; Horn, Bill; Livoni, Christopher
Subject: Save Our San Diego Countryside

To the Honorable San Diego Board of Supervisors:

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

The board of supervisors approved the current general plan and I see no reason to grant special favors & exemptions for deviations from this general plan.

We do not need to destroy farm land for more housing. The 2011 General Plan accommodates more than enough new housing -- 72,683 new dwellings -- and fully meets Regional Housing Need Allocation (RHNA) requirements.

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We should be encouraging builders to produce the Rural Villages we’ve planned where existing urban infrastructure and services ensure lower housing costs. As you are aware, building where there is no infrastructure just increases the cost of housing in order to provide the necessities of life. This will not make for "affordable" housing!

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 meets growth needs and protects open space, wildlife, and agriculture in the unincorporated parts of the county. Areas designated for sparse development in the General Plan have rugged terrain, severe wildfire hazards, lack of infrastructure and are far from jobs, transit, and essential services.

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June 10, 2020

RE: Item 1, Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination - Opposition

Dear Chair and Members of the Commission:

After reviewing the hearing materials, Endangered Habitats League (EHL) opposes formation of an Ad Hoc Committee of the Planning Commission. We find no legitimate purpose for it, and its history to date presents various legal and Brown Act concerns. Regarding fire hazard, two points are clear:

1. Required easements for vegetation clearing have not been provided.
2. Above and beyond the easement issue, a Rhode & Associates analysis, undertaken for the Fire Authority and accepted by DPDS, discloses clearly inadequate capacity of egress roads to handle evacuation demand for both the project and surrounding area, with risk of entrapment. Even if easements were provided, the entrapment risk mandates project denial.

Given these incontrovertible and un-fixable public safety factors, there is no reason to form the Ad Hoc committee. Parenthetically, we note that similar evacuation risks on other projects have been ignored by this Commission, as well as by the Fire Authority and DPDS.

EHL respects the right of the applicant to appeal to the Board, and this is the proper next step.

Sincerely,
Dan Silver

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
https://ehleague.org
To the County Board of Supervisors

I am a long-time resident of North County. I am writing this letter to express my concerns regarding the New Lilac Hills Ranch development. I cannot understand why this project located off West Lilac Road in Valley Center continues to be discussed by the County Board of Supervisors for the following reasons:

1. The number one reason is that on November 8, 2016, Proposition B was overwhelmingly defeated 63.54% to 36.46%, soundly rejecting the Lilac Hills development. The property owner should abide by the current zoning for the property that allows for approximately 110 homes.

2. San Diego County Voters approved the General Plan for the County and this project does not warrant an amendment to the General Plan per the guidelines within the General Plan.

3. March 2020, Proposition A was narrowly defeated (less than 2%) whereby any new development would have been required to be put before the voters in San Diego County. Are you listening, more and more people want smart growth. The next time this type of initiative goes before the voters it will pass.

4. March 2020, Voters rejected Proposition B Newland Sierra as they recognized a development of that size (2100 homes) in the rural areas of the county is not acceptable. The infrastructure (roads, fire safety measures) to support this massive development does not exist. The Lilac Hills project is in close proximity.

5. We keep hearing about the lack of housing. There are 60,000 approved units in San Diego County. Why are those units (near existing infrastructure) not being built first before determining the future needs of San Diego County?

6. SDSU just last week completed their purchase of the stadium property in Mission Valley and this project will provide an additional 4600 units in an area with existing infrastructure and public transportation.

7. According to the latest data, California growth has slowed dramatically, therefore realistically what are the housing needs and who really needs to be housed; those making less than $50,000. Sadly, these are not the buyers who can afford to purchase in this proposed development.

8. As for the proposed development:
   a. The roads in the area cannot support the estimated 19,000 additional vehicle trips per day. There is nothing in the developers plans that show they are widening the surrounding roads outside the immediate development. Who will address the impact to Route 395, Circle R Drive, Old Castle Road, and interstate 15?
   b. The assumption that people will work and live in the community is not realistic. Valley Center does not feature or attract employers that the residents of this community would need to justify housing prices that would START in the 500s. That is not affordable housing. Lack of high paying jobs in the area necessitates traveling to employment (personal vehicle as there is no public transportation). Not all residents are fortunate to be employed by a business that allows or can be run via telecommuting.
   c. And finally, let’s not play the game the developer promises the units will be affordable. The majority of the units are not affordable nor does the project offset the environmental impacts, with fire safety at the top of the list. We live in a rural area prone to fires and limited escape routes. We do not want to become another Paradise California.

I sincerely hope that the Board of Supervisors will put the well-being of its residents ahead of its need to placate the developers. Both parties can benefit from smart planning.

Thank you

Diane O’Toole
New eComment for Planning Commission Hearing

Donna Thomas submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 1. Discussion and Consideration of the Formation of an Ad Hoc Subcommittee for the Lilac Hills Ranch Project and Update of the Fire Safety Determination

eComment: Please stop the building of lilac hills farm. Huge fire hazard!

View and Analyze eComments

This email was sent from https://granicusideas.com

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Ann Jimenez,

My name is Doug Marquart, a resident at 8724 W. Lilac Rd across the street from the proposed Lilac Hills development since 1969. Over those many years my family and I have experienced mostly normal living conditions in and around our neighborhood. Several current and pre-existing conditions in and around the proposed Lilac Hills project have high priorities. Two such concerns have promising solutions due to the action being taken by Lilac Hills. One has been fire protection. This subject has been scrutinized from every direction possible for more than a decade whereby Lilac Hills has sought to comply with every request and more that has been addressed by county staff to mitigate all concerns related to local community fire protection.

Another issue that has concerned the neighborhood is the decades long absence of a traffic signal at the intersection of West Lilac Rd and Hwy 395. Every so many months over those past years, recurring traffic accidents happen often enough that from our home when we hear the sirens coming from our local fire station east of our home on West Lilac Rd, we wonder who has been in an accident at that intersection. We always shared concern for our children and now our grandchildren as we dared to cross that dangerous spot while driving them to school on those especially foggy mornings when we had to roll down our windows and listen to hear if there was any approaching traffic. I speak truth to the matter as I was personally involved in a collision at that intersection one morning trying to cross, and more serious was an accident there that took the life of my foreman of 37 years who was on his way to work three years ago this August. If the Lilac Hills project is approved a traffic signal is one of the conditions required to be installed at that intersection that Lilac Hills has agreed to comply with.

Another condition that has a hopeful future if The Lilac Hills project is approved is the unprecedented action that has been taken to improve traffic conditions up and down West Lilac Rd that involves straightening a major curve 3/4 of a mile east of Hwy 395 and adding an extra lane to further improve traffic flow and faster response time for fire units to pass more freely down that stretch of West Lilac Rd along the north side of the Lilac Hills proposed development.

These are just a couple of examples of the many improvements that I and my family are particularly hopeful will come to pass in our neighborhood due to this meticulously planned Lilac Hills development.

Doug Marquart