

LETTER

RESPONSE

July 20, 2014

Letter I1a

Mark Slovick
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 5510 Overland Ave. Suite 110
 San Diego, California 92123

Lilac Hills Ranch is poorly designed. Also it is not very safe. After reading the EIR concerns I have include...

- 1. It is not a feasible walking or biking community as claimed.
 - A. The school is not in the center of the community but at the back edge. Most of the homes are over half mile away making it too far to walk.
 - B. The church/possible private school is located at the south end of the project behind the gated senior area making it impossible to access except on Sunday.
 - C. Most streets lack bike lanes, including the one in front of the school, leaving only sidewalks and mud paths to ride on.
- 2. It is not a very safe community.
 - A. The church the gates into the senior community are open every Sunday for anyone to enter.
 - B. The school athletic field backs up to acres of gullies filled with rattle snakes. One snake bite on a child could be fatal. See map
 - C. Lilac Ranch Road the main road leading to the school from most of the neighborhoods does not have a bike lane. The only alternative is using the dirt/mud path.
 - D. According to figures 47 and 51 Covey Lane, the main road to the school for most of Valley Center, does not have sidewalks or a bike lane.
 - E. The dog park is surrounded by gullies with hungry coyotes.
 - F. The main town park has a motel sitting on the edge of it. How safe would the children playing in the park be with a transient population living next door in the motel?
 - G. The walking route to school for many kids is through the middle of down town either past the motel or a bar.
- 3. Poor design and limited parking.
 - A. The joint use parking lot at the county park has no turn around area. If a driver could not find a parking spot there is no way to turn the car around to exit.
 - B. The recreation center/fitness and next door restaurant share only 43 parking spaces. The staff alone would use half of the lot. In the new EIR the restaurant has been replaced by a fire station with many of the parking spaces eliminated.
 - C. The majority of the driveways are a minimum of 12 or 15 feet. Most large cars and trucks are too long and would block the sidewalks. The parking study counts only 124 parking spots on the streets. Most garages being built today are not deep enough for full size cars or pickup trucks. Where will all the cars park?

I1a-1

I1a-2

I1a-3

I1a-1 The project has been designed to encourage walking or biking by providing a network of trails and pathways and providing community services in proximity to residential use. The potential K-8 school site is located adjacent to the proposed neighborhood center where mixed-use and higher density residential use would be concentrated. While many homes would be over a half mile away from the school site, the school is located in close proximity to a maximum number of residences, which would facilitate walking and biking.

The Town Center would include sidewalks, bike lanes, and community pathways connecting to the residential villages and other community amenities. This would facilitate walking and biking. Bike lanes are also proposed on Main Street, and a Community Trail would provide connectivity from the Main Street bike lane to the proposed school site along Lilac Hills Ranch Road. Community Trails would include trail easements between 5 to 12 feet wide (depending on the trails location within the project site) with a minimum tread width of 3 feet. These trails would be privately owned and maintained by the HOA such that they would be accessible by foot or bike and not be maintained as mud paths.

There is no proposed private school located at the south end of the project in the senior area. However, the project description includes an Institutional Use site located near the southern boundary of the project. Future uses at this site could include a church or other institutional use pursuant to a Major Use Permit. Classrooms are depicted within the Institutional Use site for illustrative purposes only, as churches typically offer Sunday school or related educational opportunities (refer to Specific Plan, Part 3, and Figure 126).

Please also refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for additional details on the walking distance from various community features, including the proposed town centers (retail), community centers, parks and plazas, and school site.

I1a-2 The comment expresses various opinions that do not raise an environmental issue with respect to the FEIR. Lilac Hills Ranch Road would be developed with a Community Trail. In addition, Covey Lane would be improved with a Ranch Multi-Use Trail, as detailed in Figure 1-8 of the Project Description, Chapter 1. These trails would be maintained by the HOA and would allow walking and biking, providing an accessible route for children to walk or ride to school.

LETTER

RESPONSE

	<p>11a-3 The specific design and parking configurations for the Community Joint Use Park (P-7) to be dedicated to the County would be specified during future discretionary site plan review. The concept plan provided as Figure 136 of the Specific Plan is conceptual. Adequate access and turnaround according to County parking standards will be required.</p> <p>Parking requirements are defined by the County Zoning Ordinance and would be implemented during future discretionary review. The concept plan provided is for illustrative purposes only.</p> <p>Residential developments will provide off-street parking in the form of garages and on residential driveways. On-street parking will also be provided. Front yard setbacks are defined in the Specific Plan and vary depending on the building type/lot category.</p> <p>Part II of the Specific Plan, section E.3.d. provides Parking, Carport and Garage Design standards for single-family attached development. While the specific design of garages are not defined at this time, adequate parking would be provided in accordance with the Specific Plan and County parking standards. Tandem garages are allowed for single-family attached development, which would provide adequate space for large (long) vehicles.</p> <p>Section E.4.c of the Specific Plan, Part III provides single-family detached residential design guidelines for garage and driveway design. This section recommends that the garage wall be set back further than the front wall of the home. This design would provide for ample driveway length for vehicle parking. Tandem garages are also allowed which could accommodate longer vehicles.</p> <p>While the Specific Plan provides design guidelines for parking and garages, specific designs would not be developed until the site planning stage. As the Specific Plan places an emphasis on pedestrian orientation and walkability, the ultimate design of garages and driveways would ensure pedestrian access to sidewalks is not hindered.</p>
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LETTER

RESPONSE

<p>4. Poor trail design.</p> <p>A. Some of the trails are only 3 feet wide. Many are only two feet wide. Bicycle riders would kill the hikers or each other in head on collisions.</p> <p>B. No direct trail from the senior area to the village. Also the seniors have no legal way of driving golf carts to the village.</p> <p>5. Poor street design.</p> <p>A. Residential street "O" in phase one is two blocks. The tentative map shows more than 150 lots on just these two blocks. Many of the lots are only 50 feet wide. The set back from the street in only 10 feet. Driveways are only 15 feet long. The worst designed entry level neighborhoods (aka "Instant Slum Estates") in Moreno Valley and Adelanto are better designed.</p> <p>B. Most all traffic in the community will need to drive through the congested 'town square/ Village green'.</p> <p>C. Attempting to back a car out of the diagonal parking will be very dangerous if not impossible and will also stop traffic. Cars doubling parking waiting for someone to back out will stop traffic flow. Cars attempting to parallel park will stop traffic flow. The stream of pedestrians crossing at cross walks within the town center will stop traffic. Trucks double parking to make deliveries will stop all traffic. Grid lock could happen! The only alternative for drivers is to cut through the parking lots.</p> <p>D. In the east edge of phase three a north/south residential street has over 50 homes on it. The street is connected on the north to West Lilac Road and on the south to Lilac Hills Ranch road. Many drivers will use this residential street to avoid the congestion in the down town area. Trying to back a car out from a driveway would be very dangerous.</p> <p>E. The limited street frontage in front of the school would be reserved for bus parking making very little room for individual student drop offs.</p> <p>F. Cars will not be able to leave the school because of the backed up grid lock at the two nearby roundabouts by cars waiting in line on Covey Lane and Lilac Ranch Road trying to enter the school zone.</p> <p>G. Vehicles parked on short driveways blocking sidewalks, ultra narrow building lots, large cars and trucks parked on the streets in front of every house, only a 10 feet setback from the street to the front of the house, postage stamp area for front yards –what a mess! Driving down any of the narrow residential streets all you will see is cars and trucks parking on the street or overhanging the sidewalks when parked on the driveway, garage doors, very small fronts of houses, and very little space for landscaping.</p> <p>6. Citrus and avocado groves</p> <p>A. Citrus and avocado trees do not grow well in public maintained areas. These production trees require specialized grove care that the homeowner association 'mow and blow specialists' cannot or will not provide. No new planned communities have groves that have worked including new home developments in Irvine Ranch and Mission Viejo.</p>	<p>I1a-4</p> <p>I1a-5</p> <p>I1a-6</p> <p>I1a-4</p> <p>I1a-5</p> <p>I1a-5</p>
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LETTER

RESPONSE

<p>B. Planting citrus and avocado trees in the new cut slopes also is a very poor idea. Page 46 of the EIR Agricultural report (paid for by Accretive) reports that this will not work due to the poor soils. Note-For some unexplained reason this report which was once on the county web site has disappeared from the EIR documents. Why?</p>		<p>11a-5 (cont.) The comment provides opinion and expresses general opposition to the design of the project. These comments are noted and will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. See response to comment 11a-4 for details related to parking in garages and driveways.</p>
<p>7. Two Separate Projects or One A. The EIR maps show that this is not one project but two. These two areas touch each other at one very small point but are actually over 500 feet apart with a street connecting the two parts. B. Why is this 500 feet of connecting land not included in the project? Why is there just one project being processed instead of two.</p>	<p>11a-6 cont. 11a-7</p>	<p>11a-6 The project includes planting and maintenance of orchards on public maintained areas and within manufactured slopes as agricultural buffers. The planting within the manufactured slopes are included as an agricultural performance standard in the Specific Plan and would be maintained such that they are successful. The HOA would be responsible to assure the ongoing maintenance of grove plants within the public areas. The opinion of the commenter is noted and will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p>
<p>8. Poor School and Park Design A. The goal lines on some of the playing fields are less than six feet from the street. These streets are very narrow with cars traveling next to the curb. See map B. The park plan shows a hiking trail going through a playing field. See map C. The main ball field for the school is over 90 feet below the school making supervision impossible. The cliff would be higher than a eight story building. See map. D. The parking lot in the park as no way to turn a car around if the lot is full. See map E. Most of the ball fields for the school use are across a public street from the school making access for the school kids very dangerous. What school district would approve such a plan? See Map. F. Most of the playing fields have very little or no area for spectator viewing. See map G. On three sides of the school are gullies field with rattle snakes. H. The park has no restrooms. I. The school has no gym. J. The park has no gym. K. The school has no hardtop area for basketball courts, handball courts, tetherball, four square, jungle gym or general fitness exercise area. L. The school has no running track. M. The school has no additional land for expansion. N. The school has no practical way for safety fencing. O. The school has no access for trash, food, and other service trucks to enter. P. The school has no bus parking except using the narrow short area in front of the school that is needed for student drop off. Q. The school has less than 500 feet of street frontage leaving little room for student drop off because busses will need the space in front of the school. R. The public parks ball fields are used during the school day by the school. How can a school provide safety when the park across the street and open to the public? S. Each day before and after school grid lock will happen at the two nearby 'roundabouts' by parents dropping off or picking up their kids. This will split the community and isolate it by making it impossible to travel. See diagram T. Grid will happen twice daily when cars start backing up on the three streets waiting for a limited space in front of the school. When the first few cars want to exit to school area they will be blocked at the 'roundabouts' by cars waiting in line to enter</p>	<p>11a-8</p>	<p>The County is not aware of the agricultural report being removed from the County website. The Agricultural Resources Technical Report (Appendix F) and the Agricultural Resources subchapter 2.4 were available on the County's public website at http://www.sdcounty.ca.gov/pds/regulatory/docs/LILAC_HILLS_RANCH/LILAC-HILLS-RANCH.html throughout the public review period.</p> <p>11a-7 According to the CEQA Guidelines Section 15373, a "Project" is defined as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment..." According to CEQA, this project is considered one project, not two separate projects. The off-site improvement to the proposed Lilac Hills Ranch Road would connect the north and south portions of the project. This off-site improvement is discussed in Chapter 1.0 of the FEIR.</p> <p>11a-8 The referenced Figure 132 was provided in the Specific Plan as a schematic for illustrative purposes only. The project does not include the construction of a school. Rather, the land would be made available for a future school site. The details of school design, access, playing field locations, park trail locations, park restrooms, and the need for agreements between the school and the park would occur in the future when detailed plans are prepared and as part of a subsequent discretionary review process.</p>

LETTER

RESPONSE

the school drop off area. No one will be able to enter the area or leave. No one in the community will be able to move from the southern section to the northern section or vice versa. Classic gridlock! See diagram

U. The school and the park will need to agree and sign joint use agreements. Which school district, Bonsall or Valley Center and which community Bonsall, Valley Center, or the county will need to sign? Do they all have to agree? Good luck.

9. Other design flaws in the community

A. Why would a church want two athletic fields unless it is also a private school. What church would want to build on a site that cannot be easily accessed because it would be behind two locked senior citizen gates? How would the kids get to this private school? Accretive needs to explain this and show that an interested, willing and financially able church is ready to build.

B. Across the school in phase three a private recreational club is planned. But in phase one the Home Owners Association will have their own club. The illustrations show that the HOA club will be bigger and better than the private club. What private club would want to be there if no one would join? What would go on this site if no private club/gym was interested? Accretive needs to explain this and show that they have an interested, willing, and financially able private fitness center that is ready to build.

C. In the town center a large motel is planned but is there any demand for a motel in the area? Why would anyone rent a motel room here when much more desirable casino hotel rooms are available, also time share condos with golf are just down the road, and in city and beach motels are nearby. Accretive needs to show that they have an interested, willing, and financially able motel operator ready to build.

D. Accretive proposes a new school. Their project straddles two school districts. Neither district seems excited about a new school or cooperating with each other. Accretive response is maybe no school will be built. The problem is that Accretive is selling this complete village concept but without the school what kind of a village is left.....just a bunch of homes out in nowhere.

E. Accretive proposes a 200 bed Group Residential Care hospital. Most patients probably don't care or even remember that they are living in the middle of this 'greatest village in the world' housing development in the middle of nowhere. Most patients never leave the building unless they are going to the doctor or hospital. The nearest medical facilities are over eight miles away. How could this Group Care hospital compete with similar Care facilities located in town near doctor offices and hospitals?

Bill Aaron

11a-8
cont.

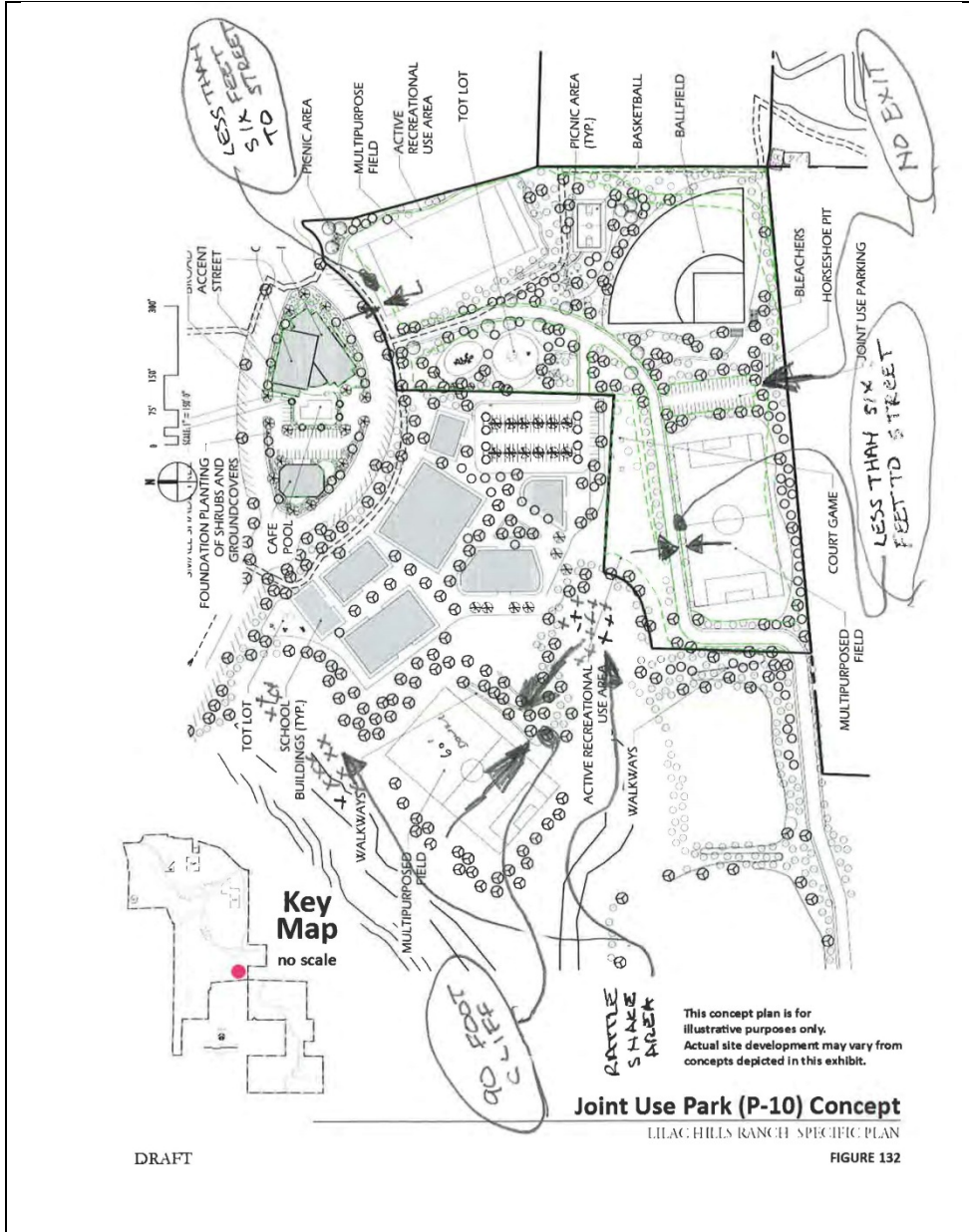
11a-9

11a-9

The Specific Plan identifies that the 10-acre Institutional Use site may be developed for uses such a church or other civic use. The schematics provided are for illustrative purposes only and do not represent the actual development proposal. The specific uses on the Institutional Use would be subject to future permitting and discretionary review.

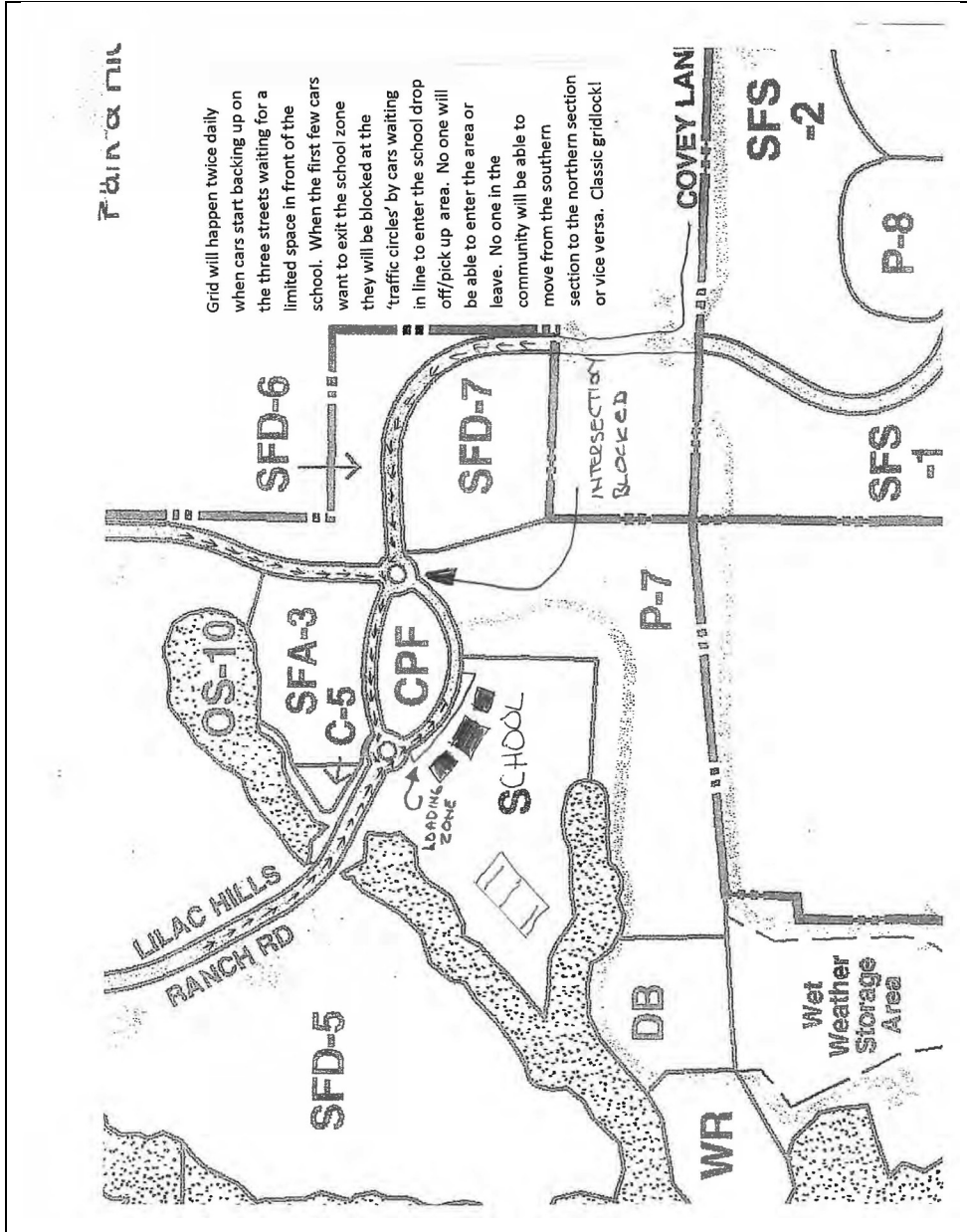
Comments 9B through 9E raise issues about the proposed land uses within the Specific Plan (such as recreational club/gym, new school, group care, motel) and the feasibility of these land uses to occur on the site. One point of clarification is that only the southern half of the Phase 5 (SFS-5 and SFS-6) of the senior community would have restricted access. Access to the church site would be unrestricted.

These comments do not raise issues relating to any physical effect on the environment or the adequacy of the environmental document. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.



LETTER

RESPONSE



LETTER

RESPONSE

7/20/14

Letter 11b

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In the comment section of the original 2013 EIR many questions were asked about how Covey Lane will be affected. Accretive had a year to respond. In their second EIR Accretive still did not answer any of the questions. Questions not answered included

1. What is the design of the intersection of Covey Lane and Lilac Hills Ranch Road. Every other intersection in the development has been engineered, analyzed, discussed forwards and backwards, and diagramed but not this intersection. This intersection is very important. It connects the unconnected north and the south half of Accretives project. It contains a controlled gate and a guard shack for the senior housing. It connects a 500 foot road segment that the Accretives owners own but do not want to be part of their project. It moves the present public Covey Lane to a new location that now will become a private road owned by Accretive. It is a very critical intersection yet all of Accretives reports never discuss this intersection. Why?
2. Covey Lane is a private road. How can a segment of it be converted to a public road without all the owners' permissions?
3. According to the specific plan long segment of Covey Lane will stay a private road but become part of Lilac Hills Ranch and owned by its homeowners. Many others properties that are not part of Accretives project front or use this road. How will these properties be affected? How will their driveways from these present homes get access to Covey Lane if this new development has a fence around it? Will they have to pay HOA fees? Will they have any rights to how this new private road is managed? Neither the EIR or specific plan, or any other documents, drawing, or illustrations answers these questions.
4. Five hundred feet of Lilac Hills Ranch Road at the intersection of Covey Lane is owned privately by the developers. This segment is not part of their proposed project. This road segment connects what is actually two separate projects that the developers are claiming is just one project. Why is this short segment not part of the project? Why is it not discussed anywhere in Accretives documents why they are excluding it from their project? How will this private road segment work since it will not be owned by the 1746 Home Owners Association or be a public road. Nothing in the reports explains this odd proposal.
5. How will existing overhead electrical wires be addressed on Covey Lane? If these wires are moved how will the existing homeowners connect? How will future homeowners

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- 11b-1 This comment is introductory in nature and does not raise an issue related to the adequacy of the environmental document.
- 11b-2 The Traffic Study and EIR analyzed traffic impacts related to the intersections for the project and the construction footprint for all improvements including the intersections. However, construction-level design for each intersection will be completed with each phase of the project. Phasing is a common approach to the implementation of a master planned community to ensure that the project is economically viable and responds to market conditions.
- The EIR has analyzed maximum impacts related to the project. The project will be implemented in phases, and each phase will be required to mitigate its impacts. Phasing is a common approach to the implementation of a master planned community to ensure that the project is economically viable.
- 11b-3 As described in Chapter 1.0, Project Description, the on-site portion of Covey Lane connects to an existing Irrevocable Offer of Dedication (County of San Diego (IOD))/easement on the eastern end of Covey Lane just west of West Lilac Road. The off-site public portion of this road would be improved within the existing road easement IOD for a distance of approximately 600 feet to its connection with West Lilac Road. The Board of Supervisors would have to accept the IOD which would make the road public.
- 11b-4 Under the proposed project, there will be a new portion of Covey Lane within the project boundary that will be constructed to private road standards and would be privately maintained by the project's HOA. For an explanation of existing and affected easement rights, both within the County ROW and along private property, please refer to the Global Response: Off-site Improvements - Environmental Analysis and Easement Summary Table.
- 11b-5 According to the CEQA definition of a project (CEQA Guidelines 15373), the project is considered one project, not two separate projects, despite its configuration. The off-site improvement to the proposed Lilac Hills Ranch Road, north of Covey Lane is discussed in Chapter 1.0 of the FEIR and is analyzed as part of the project. The physical environmental effects of the road improvement are fully analyzed as one of the project's off-site improvements. The comment will be included as part of the record and will be made available to the decision makers prior to a final decision on the project.

LETTER

RESPONSE

connect if the wires are underground and under the new private Covey Lane owned by Accretive?

6. How will the existing water pipes be addressed on Covey Lane? Will it be realigned along with the road?

7. One plan discussed in the EIR is to run a sewer line down Covey Lane. Will properties outside the development be able to use this line?

8. How will a private water line under Covey Lane, built in 1961, before the VCMWD line be affected? It is still the property of some property owners. Nowhere in the reports is it discussed. Can it be removed without it owner's permission or compensation?

9. The new school/park is proposed to be on Covey Lane. According the Figures 47 and 51 of the specific plan Covey lane will not have sidewalks. How will these kids safely get to school?

These questions and other about how Covey Lane will affect nearby homeowners and need to be answered. Accretive has done a very poor job in their explanations. How could what is supposed to be a first class developer do such a poor job in planning?

Bill Aaron

Bill Aaron

I1b-6
cont.

I1b-7

I1b-8

I1b-9

I1b-10

I1b-11

I1b-6 Site-specific planning for utilities, undergrounding and coordination with surrounding homeowners would be addressed as part of the permitting and discretionary review as part of implementation of Phase 4 of the Specific Plan.

I1b-7 Site-specific planning for locating water pipes within Covey Lane would be addressed as part of the permitting and discretionary review as part of implementation of Phase 4 of the Specific Plan.

I1b-8 Wastewater infrastructure is proposed to be sized to serve only the project. However, wastewater facilities would be under the control of the Valley Center Municipal Water District (VCMWD) and the district could decide to provide capacity to surrounding residents after project approval. Chapter 1.0, subchapter 1.8.4.3 and Chapter 3.0 of the FEIR addresses the project plans for wastewater service.

I1b-9 Site-specific planning for water pipe undergrounding within Covey Lane and coordination with surrounding homeowners would be addressed as part of the permitting and discretionary review as part of implementation of Phase 4 of the Specific Plan.

I1b-10 A Ranch Multi-Use Trail is proposed along Covey Lane at the frontage of the park area (P-7), near the school. Existing plans do not propose sidewalks along the portions of Covey Lane, east of Lilac Hills Ranch Road. The project would provide a site for a potential school, but would not develop the school as part of the project; therefore, no safety related impacts associated with the lack of sidewalks along this segment of Covey Lane would be possible.

I1b-11 The conclusory statement is noted.

LETTER

RESPONSE

7/20/14

Letter I1c

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The EIR/specific plan for Lilac Ranch Hills explains that the developer as the option to build five phases of this project in any order they see fit and on any time frame. My concern would be what would happen if only part of it was built and the developer went out of business. It would be a bunch of homes on small lots stuck out in the middle of nowhere with few if any of the amenities that were promised. The first few new homeowners would suffer along with the existing neighbors.

I1c-1

The reports state it may take many years to build this project. Most of the streets, parks, pools, club house, school, trails, green belts, open spaces, churches, stores, and all the other amenities will not be there for the first home sales. When comparing what Accretive developers are proposing to two new master planned communities in Orange County many differences become apparent. Irvine Ranch now is selling a new village called Orchard Hills. The Mission Viejo Company is also selling a new village called The Ranch. These villages are similar to Lilac Hills Ranch. Each as a mix of several types of homes (single family, condo, town homes, separate senior citizen area with many different types of homes), schools, shopping, and parks). Each is about the same size. But the biggest differences are that these two developers built all the schools, parks, community centers, streets, sidewalks and trails, before they sold their first house. All the different types of housing were available the first day of sales. The first home buyers know what their village/community will look like because it is complete and not just pictures and promises from the developer. If these two developments can do it right then so can Accretive. If they can't maybe they should sell their development to someone who can.

I1c-2

Bill Aaron



I1c-1

The phasing plan for the project is detailed in the section IV of the Specific Plan, part III. This implementation plan includes requirements that would need to be satisfied prior to any final subdivision map, such as a Park Site Plan, open space dedications, and landscaping. Detailed requirements for each phase of implementation are included in this section of the Specific Plan.

I1c-2

The public improvements listed (non-residential project components) are proposed component parts of the project and are not required as environmental mitigation for identified impacts. The comment expresses a desired phasing strategy to construct the non-residential components prior to sale of residential units; however, the comment does not raise an issue related to the adequacy of the environmental document.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

LETTER

RESPONSE

Letter I1d

July 20, 2014

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The California Environmental Quality Act requires the EIR to consider a reasonable range of potentially feasible alternatives that will foster informed decision making. A number of alternatives to the project were considered during preparation of the EIR. The present plan has very little support from the community. Another alternative that might get support would be similar to what is happening all around the country. It would be a limited development with most of the land in a conservation farm easement. The Journal of Sustainable of Real Estate by the University of San Diego published a researched article about how in Colorado housing in Conservation Developments worked. See attachment. By limiting the number of homes and increasing the open spaces buyers are willing to pay much higher price for the homes. The developer sold far less building lots to a builder but each lot sold for a much higher premium and the project had much lower infrastructure costs. The community and the environment win by a less dense communities with more open spaces. The developers get their projects approved and still makes a nice profit. Everyone wins.

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Using the concepts used in Colorado a much more desirable village could be developed. The town village could be a little larger with more green belts and open spaces. The country inn and most of the town would surround a small lake. The down town village area has much larger plaza areas. The condos and townhomes would be buried with more landscaping, and parking lots are better hidden from the street views. Single family homes would be in 'six packs' surrounded by greenbelts eliminating the boring streets scenes. Outside of the village area are many equestrian half acre estate homes next to horse trails. The majority of the 608 acres would be open space or small farms/ranches. Lilac Ranch would bisect the project connecting to all the farms, ranches, church/private school, community center, and vineyards. Horse and hiking trails would surround the entire project and streets. An equestrian center/ stables would be in the south west corner. See attachment for pictures.

I1d-3

Bill Aaron

Bill Aaron

I1d-1

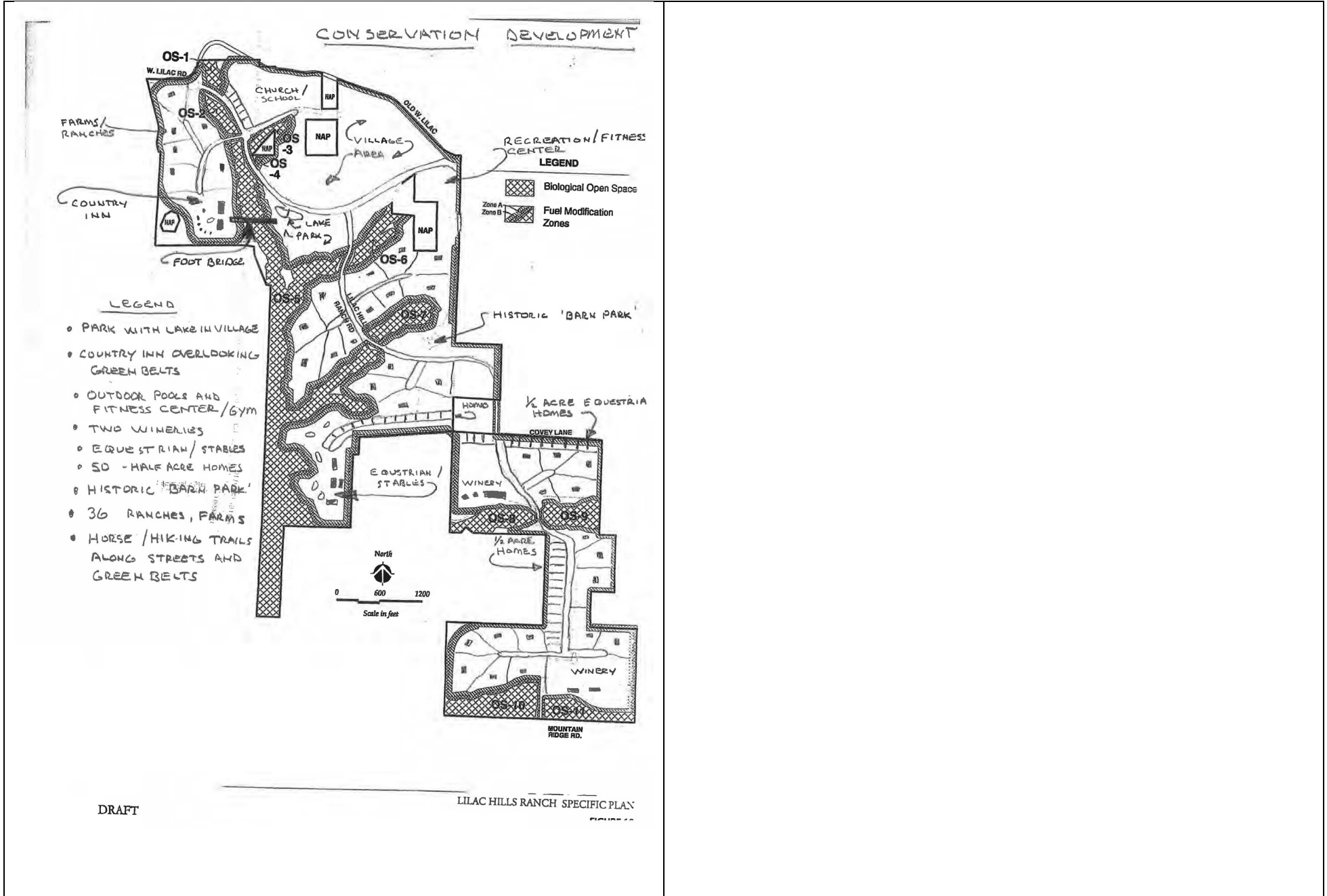
This comment is an introductory statement that is further developed in the following comments and suggests that a limited development alternative should have been included in the FEIR. As required by CEQA, the FEIR includes a reasonable range of alternatives, including reduced growth alternatives, as described in Chapter 4.0 of the FEIR.

I1d-2

The comment does not raise an issue related to the adequacy of the environmental document. The article referenced is included as an attachment to this comment and will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. With respect to the suggestion that a reduced project alternative be evaluated, please refer to FEIR Chapter 4.0, where multiple alternatives to the project design are analyzed as required under CEQA, including those that would qualify as a reduced project alternative.

I1d-3

The comment does not raise an issue related to the adequacy of the environmental document. The commenter provides an alternative development option referencing concepts used in Colorado and an attached development schematic. This information will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.



LETTER

RESPONSE



Park is in the middle of village center. Outdoor café and tavern overlook the lake. Picnic area overlooks lake. Fitness training circuit surrounds lake.



County Inn overlooks open space with views of the lake. Inn connects to park and town with pedestrian bridge.



LETTER

RESPONSE

Views from Lilac Ranch Road also include beautiful ranch homes, homes with vineyards, corrals, barns



Roads and driveways off Lilac Ranch Road lead to farms, ranches, and estates homes



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Lilac Hills Ranch Road bisects entire project with a large median with native landscaping. Trail on one side. Fenced horse path on other.



Views from Lilac Ranch Road include horse ranches, farms, parks, vineyards, and flower fields.



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RESPONSE

The beautiful recreation and fitness center in the village



Vineyards with tasting rooms and outdoor banquet facilities are off Lilac Hills Ranch Road



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Miles of horse, hiking and biking trails surround the ranch passing ranches, vineyards, groves and farms



LETTER

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Active and passive parks along Lilac Hills Ranch Road



Half acre estate homes with barns scattered throughout the ranch



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Equestrain riding center and horse stables at the end of Covey Lane connect to miles of trails



'Historic Barn Park' remembers the past.....meeting hall for clubs and civic groups.....social hub of the community



Comparative Analysis of Housing in Conservation Developments: Colorado Case Studies

Authors Christopher Hannum, Steven Laposa, Sarah E. Reed, Liba Pejchar, and Lindsay Ex

Abstract Conservation development (CD) is an approach to the site design of a development property that combines residential development and land conservation. CD has been heralded as an environmentally-friendly development alternative and a means to finance land conservation. We employ a Box-Cox hedonic methodology using transaction data for all CD subdivisions in five Colorado counties, as well as a unique sample of homes in comparable nearby rural non-CD subdivisions to assess the value of the CD amenity to homeowners. Our research demonstrates significant sales price premiums for homes located in regulated and unregulated CDs relative to comparable non-CDs.

Conventional residential development poses several challenges to sustaining healthy ecosystems and human communities in the United States. Residential development is a leading driver of changes to biodiversity (McKinney, 2002) and ecosystem services that are critical for human well-being (Kroeger and Casey, 2007). Moreover, conventional residential designs have been linked to declines in the health of human communities (Frumkin, 2002). Land use and residential design also affect human well-being through public health, social equity, climate impacts, and community integrity (Dannenberg, 2003; Alberti 2005; Ewing, Bartholomew, Winkelman, Walters, and Anderson, 2008).

Although efforts to conserve natural resources on private lands have grown rapidly in recent years (Chang, 2010), land continues to be converted to residential and urban development at twice the rate that it is being protected (Aldrich and Wyerman 2005; USDA, 2009). Current funding for land conservation is inadequate to assemble an inclusive and ecologically viable network of conservation areas (Lerner, Mackey, and Casey, 2007). A recent National Association of REALTORS® (NAR) study demonstrated that environmental features are important to 90% of home buyers in the U.S. (NAR, 2008). The high rates of land development, conservation finance gap, and changing preferences among homeowners make this a critical time to examine new approaches for incorporating conservation objectives into development practices, financing land conservation, and providing a model for sustainable homeownership rates.

Exhibit 1 | CD Examples



Source: *Conservation Design for Subdivisions* by Randall G. Arendt. Copyright ©1996 by Island Press. Reproduced by permission of Island Press, Washington, D.C.

Standard economic theory suggests that as income rises, so too will demand for most goods, services, and amenities. Since economic growth inevitably leads to increases in income and living standards in the long run, this presents a conundrum for advocates of sustainable building practices and many environmentally-friendly housing attributes and amenities. Bloom, Nobe, and Nobe (2011) find a positive price premium associated with ENERGY STAR homes, while Aroul and Hansz (2011) find a similar premium for dual-pane windows. Goodwin (2011), examining survey data, finds that the importance placed on ENERGY STAR ratings and heating and cooling costs are negatively correlated with the subject's income. Many green amenities provide external benefits to society, but only cost savings to the individual directly affected. These costs matter less to high-income individuals, and if the green attribute provides an effective disamenity, as with compact fluorescent bulbs (Wall and Crosbie, 2009), that fact could inhibit adoption. Even where the green attribute does not create a disamenity, as with dual-pane windows, we would expect future income growth to slow the pace of adoption. However, some characteristics of a sustainable housing development might provide tangible aesthetic benefits to the individual homeowner and in such a case would expect greater possibilities for private supply of green housing amenities with limited need for government involvement.

Conservation development (CD) is an approach to the site design of a development property that combines residential development and land conservation with a goal of providing functional protection for natural resources (Milder, 2007; Pejchar, Morgan, Caldwell, Palmer, and Daily, 2007). CD includes a wide range of project types, ranging from just a few houses on large tracts of rural land, to suburban conservation subdivisions, to large master-planned communities in urban areas. CD has been heralded as an environmentally-friendly alternative to residential sprawl, as well as a means to finance land conservation. Exhibit 1 (Arendt, 1996) illustrates a CD (c) in contrast to a conventional dispersed development (a). In a CD, the natural resources of the property (b) are initially mapped and protected and home sites are then clustered on a smaller portion of the site.

Although CD has been in use for more than four decades in the U.S. and accounts for up to one-fourth of private land conservation (Milder and Clark, 2011) and a growing proportion of residential development activity, little is known about home sales, valuation trends, absorption patterns, and marketing strategies in CD

Exhibit 12 | Extended County Level Regression Results (Marginal Effects)

Variable	Larimer	Douglas	Mesa	Routt
LIVING AREA	\$62.17	\$61.51	\$56.22	\$230.23
LOT AREA (IN SQ. FT.)	\$0.07	\$0.12	\$0.11	\$0.05
AGE	\$149.27	-\$3,006.04	\$159.02	\$1,443.10
NUMBER OF BATHROOMS	\$9,100.33	-\$648.52	\$8,332.10	\$58,609.43
DISTANCE TO LARGEST TOWN	-\$0.03	-\$0.38	-\$2.18	-\$10.00
NUMBER OF BEDROOMS	-\$11,317.93	—	-\$14,866.89	-\$29,973.10
GARAGE	\$44,196.44 [18%]	\$24,939.11 [7%]	\$33,291.88 [20%]	—
BASEMENT	\$33,578.80 [14%]	\$6,521.70 [2%]	\$-23,505.66	—
FINISHED BASEMENT	\$-48,369.23 [-20%]	\$-10,069.39 [-3%]	—	—
CENTRAL AIR	\$11,106.23 [5%]	—	\$16,161.59 [10%]	—
NO QUALITY REPORTED	\$133,949.76 [56%]	—	\$-34,753.66 [-21%]	—
EXCELLENT QUALITY	\$197,330.27 [-21%]	\$39,061.44 [10%]	\$12,593.14 [7%]	—
GOOD QUALITY	\$69,712.52 [29%]	\$28,025.21 [7%]	\$5,848.08 [3%]	—
FAIR OR LOW QUALITY	\$-39,279.96 [-16%]	—	\$-35,789.55 [-21%]	—
POOL	\$28,271.25 [12%]	—	\$9,231.92 [5%]	—
WATERFRONT	\$-7,548.14 [-3%]	—	—	—
REGULATED C.D.	\$34,137.22 [14%]	\$97,594.29 [26%]	\$20,707.78 [12%]	\$253,416.84 [30%]
UNREGULATED C.D.	\$39,782.75 [16%]	\$147,473.92 [39%]	\$14,924.09 [9%]	\$433,270.85 [51%]

Note: Brackets indicate percentage change for Box-Cox marginal effects.

Conclusion

Housing markets at the national, regional, and city levels are recovering from the housing crash of 2007. Conservation development projects are not immune to the stigma and negative consequences of households deleveraging, increasing defaults,

decreasing second home markets, and lower homeownership rates (Burger and Carpenter, 2010). Numerous transactions were eliminated from our study due to deed types reflecting foreclosures and public sales. As the country eventually recovers from the Great Recession of 2007 and 2008 with improved economic conditions, interest in CDs and other housing transactions is likely to improve.

Our research focused on three questions. Based on our analysis, we conclude there are significant differences in prices for homes in CD projects versus 35-acre, large lot, and unregulated CD projects; there are significant differences in prices for homes in CD projects across the five Colorado counties; and there are significant differences in the total number of sales and transactions between CD projects and non-CD projects.

Despite low per hectare yields, CDs may not represent an unattractive alternative to developers of rural land or land on the urban/rural fringe. As other authors (Mohamed, 2006; Bowman, Thompson, and Colletti, 2009) have noted, there are reasons to expect cluster development plans like CDs to decrease developer costs rather than raise them—if we compare plans for the same site. While lot size does itself represent an amenity, the results suggest that the impact of additional privately-held land is only 9 cents per square foot or \$4,062 per acre. Given the average lot size of a home in a large lot development (4.6 acres), allocating two-thirds of the land of the development site to conservation would provide roughly twice the price premium of allocating the same land to larger individual lots.

Our research demonstrates a significant sales price premium for homes located in CDs relative to comparable non-CD projects, while controlling for housing, time, and location factors. We find that while the price premium associated with regulated and unregulated CDs is similar, the impact of property characteristics on prices in the two categories may differ. Understanding such differences between CDs and non-CDs will help developers and residential brokers create appropriate development and marketing strategies. If CD projects are also ecologically beneficial, our results suggest that this approach to development is a viable tool for conservation finance.

This research is limited to sales transactions for the five counties and four development categories. We do not address initial lot sales, net absorption trends, time to construct a home after the initial closing, or the value of the initial home; we capture only sales subsequent to all of these events. It is therefore possible that further research into the initial development, marketing, and home construction factors may complicate or confirm our results. If a relationship exists between turnover and CD status within specific school districts only, our data set may not capture bias induced by school district. Additionally there is very limited research on the overall financial returns to the developer with sufficient data such as time-dependent development costs, expenses, and lot sales to calculate internal rates of returns. Although our extensive dataset included transactions indicating foreclosures, we did not address how CD projects compared to non-CD projects during the recent housing downturn.

OPEN SPACES = HIGHER PRICES

Homes built in land-conservation developments sell for 29% more than homes built in traditional rural developments, a Colorado study finds



CALL IT the flora-and-fauna effect: Home buyers will pay a premium to live near open, undeveloped land. So much for good neighbors.

That's the conclusion of a Colorado State University study of home prices in conservation developments, where residential real estate is limited and a substantial amount of land, usually 50% to 70%, is set aside as open space. "That could mean wildlife habitats, agricultural lands, important cultural sites, open space for scenic vistas," says Sarah Reed, co-author of the study and associate conservation scientist with the Wildlife Conservation Society.

Researchers compared 2,222 home sales in five counties in Colorado between 1998 to 2011. The conservation developments set aside an average 64% of land as open space, while traditional rural subdivisions set aside 4.9%. Based on the analysis, homes in conservation developments sold for 29% more than homes located in conventional residential projects.

For a homeowner, this means that the value of their home will be greater just by being in a development with open space," Prof. Reed says.



Conservation Development

These illustrations show two possible models for a development site in Sussex County, Del. In a conservation development, 50% to 70% of the land is typically left open. Home lots are depicted as yellow blocks.

Traditional Development

In a traditional rural subdivision, much less land is set aside as open space.

Increasing lot size in an undesignated conservation development raised the market price by 38 cents per square foot or \$16,662 per acre, researchers found. In more traditional developments, a bigger lot size translated to only 9 cents per square foot, or \$4,062 per acre. The study, funded by the National Association of Realtors and CSU's School of Global Environmental Sustainability, was published in December 2012 in the *Journal of Sustainable Real Estate*.

A 2011 study in the *Journal of Conservation Biology* estimates that roughly 310,000 acres have been developed in the U.S. as conservation subdivisions, where anywhere from

30% to 70% of land is protected as open space. More subdivisions probably qualify, but developers haven't sought designation by the county as official conservation developments.

Regardless, the price perk is still there: Homes in undesignated conservation developments sell for 25% more than those in conventional subdivisions, the Colorado State researchers found.

Open-space living often appeals to active, outdoorsy buyers—"tree-huggers," says John Slade, a real-estate agent with Webster Realtors in McKee Real Estate. One of the premier conservation developments, Prairie Crossing in Grayslake, Ill., about an hour from Chicago, designates more than 60% of its 677-acre site as protected open space.

"You can walk out your back door and start jogging on a trail that takes you through miles and miles of forest preserves," Ms. Slade says.

—Suzette Tamarka

LETTER

RESPONSE

Letter I1e

July 20, 2014

Mark Slovick
Planning and Development Services-San Diego County
5510 Overland Ave. Suite 110
San Diego, California 92123

"A focal point of the community may contain elements such as an Amphitheater, which will host festivals, musical performances, celebrations and community events....."

"With a Town Center that encourages gathering, and promotes walkability in a village setting with conveniently located services and amenities....."

"A community that preserves our rural character....."

"Preserving and conserving open space and agriculture....."

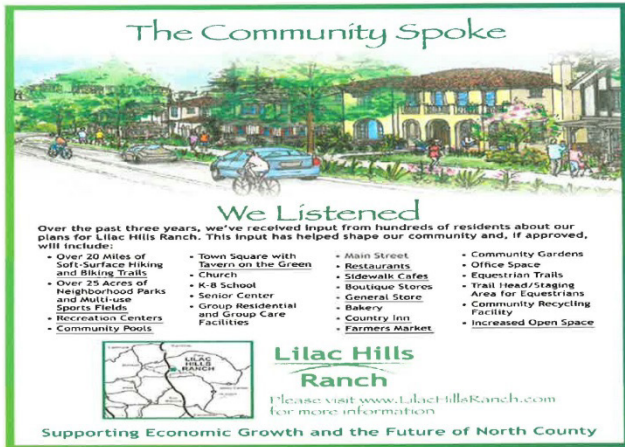
These statements and others that appear on Lilac Hills Ranch web site or in the Specific Plan are very deceptive. I do not see an amphitheater anywhere in the documentation except for a small concrete step next to the sidewalk in the town square. If it 'promotes walkability' why is the senior housing over one mile away from the town center? How does it 'preserves our rural character' when 1746 homes are built of 250 acres which is denser than most major cities? 'Conserving open spaces' are just the gullies that are impossible to develop. No land is being conserved. The marketing word for gullies is 'Biological Open Space'. How does planting a row of avocado or orange trees on a cut slope conserve agriculture?

Along with these false statements the pictures of their web site and in the Specific plan are very deceptive. For example ;



I1e-1

I1e-1 The first five pages of this comment letter refer to statements and graphics that appear on the Lilac Hills ranch website. As these graphics and statements are not representative of information contained within the FEIR, these comments do not raise environmental issues or provide information that conflicts with information contained in the FEIR. The Lilac Hills Ranch website was provided for purposes of public information during project development and does not necessarily reflect the project that has been presented in the FEIR. These comments will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.



This opening page on their web site shows beautiful estate homes, parkway, street with a bike path, and large estate lots on the ridge. Nowhere in their project does this street or ridge lines with estate homes.



This drawing appears to be a block long pedestrian plaza with an outdoor farmers market with wood arbors and stone pillars. Also in the background are rolling hills with the large orchard and a row of estate size homes? The Specific Plan does not show this.

11e-1
cont.

LETTER

RESPONSE



Where is this winery visitor center and vineyard? It is not on the Specific Plan. Where in the development is the ridge in the background with estate size lots and a large orchard on the hill?



This drawing of the market looks like a very large outdoor seating area on a brick lined pedestrian plaza. Figure 72 in the Specific Plan shows only a very narrow side walk next to the main streets on two sides of the market, a loading dock on the third side, more stores and a parking lot of the fourth side.



This drawing looks like a park with beautiful homes in the background. But what is missing from the drawing is that it is a very small park with surrounded sides by the main streets of the project. Also these beautiful homes do not exist because stores are across the street not these homes.

I1e-1
cont.

LETTER

RESPONSE



The caption for this drawing is '20 miles of trails'. The drawing gives the impression of 20 miles of beautiful wide trails and green belts. In the Specific plan most of the trails are not in green belts but just unpaved dirt sidewalks next to the roadways. According to the Specific Plan many of the trails are just 24 inches wide.



This drawing looks like the pool in the senior center. In the back ground are estate size lots in surrounded by large groves. The Specific Plan does not show any large estate lots or large groves in the senior area.



This drawing looks like a restaurant with outdoor seating 12 inches from the busy street. How can pedestrians use the sidewalks? Are the streets going to be made from bricks?

I1e-1
cont.

LETTER

RESPONSE



This drawing looks like a café with an outdoor seating area in a very large pedestrian plaza. The town center concept plan, figures 72 and 134 in the Specific Plan, do not show this large plaza anywhere in the town center.



This drawing on their web depicts a beautiful '5 star' looking resort hotel. In the Specific Plan the footprint of the hotel looks much different. It is surrounded on three sides by public roads with no room for any landscaping. On the fourth side of the motel is a parking lot with some parking spaces right next to the building.



This drawing looks like a very large fountain in an area called "The Tavern". The seated people give to fountain a size of 14 feet or taller. The arbor appears to be over 18 feet tall and 40 feet square. Figure 134 (town center concept) does not show this arbor or fountain. Also the people on the grass field behind gives the impression that this area is very large playing field. Again, Figure 134 shows this area to be about 100 feet wide and 300 feet long or about the size of a small gym.

l1e-1
cont.

LETTER

RESPONSE

In the Specific Plan fifteen homes are showcased as representative home styles. Of these 15 beautiful homes few will fit on the most common lot size of 5000 square feet. Only the houses with garage in front will fit these very small lots. Of the houses that will fit these small lots the largest feature on the front facade will be the garage doors. The front of the house will be much smaller. The actual street scene will be driveways, garages, parked cars everywhere, and postage size front landscaping. The 15 homes are beautiful but most cannot be built except on very few lots. Again Accretive is misrepresenting their project.

Many people will judge this project by looking at just the drawings. These drawing are a misrepresentation of what is in the Specific Plan. If Accretive wants the support from the community then they should not lie to them. They have been and continue to be very dishonest.

Bill Aaron

11e-2

11e-2

The home styles detailed in the Specific Plan would fit on the proposed lots. The comment expresses the opinions of the commentator and does not raise an issue with adequacy of the environmental document. These comments will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.