



## CITIZENS COORDINATE FOR CENTURY 3

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September 4, 2015

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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.



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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



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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