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Via Electronic Mail

San Diego County Planning Commission
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Re: Accretive Plan Amendment Authorization

Save Our Forest and Ranchlands (“SOFAR”) and the Cleveland National Forest Foundation (“CNFF”), two organizations dedicated to progressive land use planning and the protection of vital natural resources, are submitting comments on the Plan Amendment Authorization (“PAA”) for Accretive (also known as the Valley Center Sustainable Community project), a Master Planned Community proposed for development on agricultural lands in the Valley Center Community Planning Area of the County of San Diego (“project”). We are writing in opposition to the project, because (1) the applicant has not adequately analyzed or demonstrated the need for housing at the project site and (2) despite claims from the project’s proponents, the project’s location and scale significantly undermine its ability to serve as a smart growth project.

Project Need

A recent newspaper article from July 20, 2010 quoted Developer Randy Goodson of Accretive Investments Inc. as stating that he expected there to be “an acute housing shortage” within the next five years, which the project could potentially help to offset.¹ According to the PAA, the project would include “no more than 1,746 homes” on the project site.²

¹ http://www.nctimes.com/news/local/sdcounty/article_524c5881-8554-5195-8dc8-899bd128964f.html

² http://www.heartofvalleycenter.org/pdf/Accretive_PAA2.pdf

On July 12, 2010, CNFF released an infill study that used data from the San Diego Association of Governments (“SANDAG”) to determine that with existing zoning there is enough development capacity to accommodate approximately 400,000 new homes in the incorporated areas (cities) of San Diego County. SANDAG recently determined that the region will require 230,000 new housing units in San Diego County by 2030, demonstrating that without making any changes to zoning, all of the region’s projected housing needs for 2030 could take place as infill development (within the incorporated cities of San Diego), and the cities would still have 170,000 additional units available for development beyond 2030.³

As such, the claim that using this project to add an additional 1,746 housing units in unincorporated San Diego County to fulfill a projected housing shortage expected in the **next five years** is completely false. Furthermore, the infill study reveals that any project proposed within the San Diego County’s unincorporated region through the year 2030 (and likely beyond) is not necessary, because a project applicant could find an appropriate offsite alternative within the County’s incorporated cities.

Smart Growth

The project’s PAA claims that “...off-site trips will be reduced by including neighborhood commercial, schools, religious institutions and active recreational parks within a comprehensively planned and connected environment.” While reducing some off-site trips may be possible with the project’s proposed amenities, the PAA does little to mention how many off-site trips are projected and what the trip lengths would be.

The PAA also mentions that the project is within the service area of the North County Transit District (“NCTD”), and that “the applicant intends to work with NCTD to identify mass transit deficiencies in the area and potential facilities that could be located on the property to improve transportation in the area.” However, the PAA conveniently leaves out the fact that the project is well outside of SANDAG’s Transit Priority Areas (“TPA”) boundary, which is designated on their Smart Growth Concept Map.⁴ Given that the project is outside of the TPA boundary, it is highly unlikely that it will be linked to the regional transit system in any reasonable amount of time, concluding that residents of this community will likely have to rely on personal automobiles for all off-site travel.

Considering the project's considerable distance from job centers and likely dependence on automobile travel for commuting purposes, it is highly likely that the daily trip estimation and therefore annual vehicle miles traveled (“VMT”), carbon emissions, and air quality emissions from this project will be significant. These kinds of potentially significant and likely unavoidable impacts demonstrate that the project is anything but sustainable, and instead represents sprawl development in the backcountry of San Diego.

Furthermore, the project site is located on currently undeveloped agricultural lands, and development at this site would therefore result in a direct impact to Agricultural Resources. In

³ http://www.transitsandiego.org/transitsandiego/pdf/Infill_Study.pdf

⁴ http://www.sandag.org/programs/land_use_and_regional_growth/comprehensive_land_use_and_regional_growth_projects/RCP/region.pdf

2007 the American Farmland Trust listed San Diego as number eight on a list of California counties with the most farmland conversion, and was found to have the second most total acres of land urbanized between 1990 and 2004.⁵ Similarly, a recent analysis of current threats to wildlife conservation in the United States noted that San Diego ranks number nine on a nationwide list of counties with the largest amount of open space projected to be developed through 2025 under existing sprawl patterns.⁶ These trends demonstrate that urbanization of agricultural and open space lands, such as that proposed by the project, are incredibly destructive and thus the project cannot possibly be labeled as “sustainable.” Furthermore, these trends show that the San Diego region must make a greater shift away from sprawl development, because we cannot afford to continuously lose precious agricultural and open space areas.

Conclusion

San Diego’s sprawl development history has been unbelievably destructive, jeopardizing our environment, our communities, and even our economy for the sake of development and potential economic returns. The CNFF infill study demonstrates that for practical reasons sprawl is no longer necessary, and market trends show that compact urban infill development in existing cities is becoming increasingly attractive and preferred over single family homes in distant communities. It is a fundamental truth that the region will need more housing units in the future, however it is no longer true that we must destroy ourselves to fulfill this need. The Accretive Project represents a past of destructive sprawl development that cannot continue if San Diego is going to be truly sustainable and “meet the needs of the present without compromising the ability of future generations to meet their own needs.”⁷

Sincerely,



Duncan McFetridge

⁵ http://www.farmland.org/programs/states/ca/documents/PavingParadise_AmericanFarmlandTrust_Nov07.pdf

⁶ http://www.nwf.org/Wildlife/Wildlife-Conservation/Threats-to-Wildlife/~/_media/PDFs/Wildlife/EndangeredbySprawl.ashx

⁷ <http://www.un-documents.net/wced-ocf.htm>