

## Ehsan, Beth

---

**From:** Doug Dill <doug.dill@att.net>  
**Sent:** Friday, June 12, 2015 1:27 PM  
**To:** Ehsan, Beth  
**Cc:** Sibbet, David  
**Subject:** Valiano DEIR Comments ? June 11th SDPG meeting

The motion at last night's SDPG meeting to approve submitting the comments below to the Proposed Valiano General Plan Amendment (GPA) Project - SP13-001, GPA13-001, STP13-003, TM5575, REZ13-001, ER13-08-002 Draft Environmental Impact Report (DEIR).

Vote: 9 -YES, 0- No, Abstain: 1 (L. Jones)

Absent SDPG members: B. Liska

Vacant SDPG seats: 4

---

### San Dieguito Planning Group June 11, 2015 Meeting

#### **Agenda Item 6H –Comments to Proposed Valiano General Plan Amendment (GPA) Project – SP13-001, GPA13-001, STP13-003, TM5575, REZ13-001, ER13-08-002 Draft Environmental Impact Report (DEIR).**

San Dieguito Planning Group comments to the Valiano DEIR covers the following key Land Use points:

- Inconsistencies with the Community Plan
- Inconsistencies with the General Plan
- Project Alternatives
- Justification for the GPA

The DEIR does not adequately analyze several important aspects of impacts on the community, as summarized below.

#### **LAND USE – Inconsistent with the Community Plan**

The DEIR falls short on analysis to the impacts on community character.

EIR section 1.6: The Valiano project is inconsistent with the Harmony Grove Community Plan **Policy LU-2.2.1.**

From the EFHG CP: *"Issue LU-2.2. Several agricultural operations are finding that limits to their operations are leading them to consider re-zoning and re-development in the near future. In addition, non-resident land speculators have purchased local undeveloped land in the hopes that higher density will be adopted by the Board of Supervisors through General Plan Amendments. Development of these parcels outside the proposed Harmony Grove Village Boundary (refer to Figure 3) with an urban, clustered, or suburban design threatens the continued existence of the rural residential and equestrian character of Elfin Forest / Harmony Grove.*

**Goal LU-2.2** *Preservation of the lifestyle of the rural resident while accommodating growth.*

**Policy LU-2.2.1** *Ensure that the number of urban residences does not greatly exceed that of the rural residences in the greater unincorporated communities of Harmony Grove and Eden Valley.*

Although the project's density falls into the semi-rural category, and the project emphasizes semi-rural elements and themes, the project design features closely clustered, suburban homes with the majority allowing no horse keeping. Because the associated **Issue LU-2.2.1** specifically calls out an "urban, clustered, or suburban design" as the types of residence this policy is directed toward, and further specifies that this clustered design "threatens the continued

*existence of the rural residential and equestrian character of Elfin Forest / Harmony Grove,*” the project’s contributions to the urban /rural balance should be calculated and any impacts identified and mitigated.

The community plan supplements countywide policies and “further directs the land uses and development desired to achieve the community’s vision.” (From “*How to Use the Community Plan*”, page 5, EF-HG CP). The vision of the future ideal state of the Harmony Grove community is described in the CP: “The historic rural habitat is preserved where the Village is *surrounded by large-lot rural homes and small, family owned farms and vineyards* that preserve the critical relationships necessary for this environmentally sensitive and balanced green community. *The all-important rural voice is not overwhelmed by the urban voice*” (page 23; italics added for emphasis). The HG CP also clearly defines the Existing Community Character: “Some of the key elements of the Harmony Grove character and values include one- and two-story single family homes on large (multi-acre) lots; large animal facilities on residential properties; *no clustered development*; no “cookie-cutter” developments; no walled developments, and no gated communities” (page 16; italics added for emphasis).

Thus the clear intent of **Policy LU-2.2.1** is to prevent the current Harmony Grove rural residents, identified in this CP as living in large lot equestrian properties, from becoming outnumbered by residents of clustered, small lot, non-equestrian properties. This skewed ratio would create a majority voice for the suburban resident and encourage migration of the original rural equestrian residents out of the community, further eroding the community character and culture. Development according to the current GP yields an urban/rural balance consistent with **Policy LU-2.2.1** (see calculations below). Development according to the Valiano GPA, including counting the project’s horse keeping properties as rural residences, still yields a 3 to 1 urban over rural, altering the residential balance that **Policy LU-2.2.1** was designed to protect. This issue and the possible impacts to community character should be studied in the EIR.

Comment for EIR section 3.1.4.2: The Valiano project, by its clustered design, is inconsistent with **Policy LU-2.2.1** (see related comments in EIR section 1.6) and thus conflicts with policies designed to protect the environment. Consistency with **Policy LU-2.2.1** preserves the vision of the Harmony Grove community as described in the CP: “The historic rural habitat is preserved where the Village is surrounded by large-lot rural homes and small, family owned farms and vineyards *that preserve the critical relationships necessary for this environmentally sensitive and balanced green community*” (page 23; italics added for emphasis). The project’s clustered design significantly reduces the number of large lot properties that would provide opportunities for small, family owned farms and vineyards. The Community Plan’s vision is for produce from these small farms to be sold locally in the HG Village center, thus lowering traffic and emissions, contributing to a balanced, green community as described in the CP. The impact of an inconsistency with **Policy LU-2.2.1** of the clustered design on this green environmental balance with agricultural resources should be studied.

As noted in the Valiano FFP, “*as the density of structures and the number of residents in the interface increases, potential ignition sources will multiply and a large wildfire occurrence increases.*” Consistency with **Policy LU-2.2.1** would significantly lower the number of residents and reduce the potential for human-initiated ignition sources. Consistency with **Policy LU-2.2.1** would avoid or reduce most of the significant impacts associated with the project, including unmitigated aesthetics and air quality impacts; and impacts related to biological resources, cultural resources, noise, paleontological resources, transportation/traffic, hazards and hazardous materials, public services (fire protection), geology and soils. The extent of compliance of the project with CP **Policy LU-2.2.1** and the possible impacts to the local environment of non-compliance with this policy should be studied in the EIR.

The County position states “The project's density falls into the semi-rural category, and the design of the project emphasizes semi-rural elements and themes. Thus the project will not cause urban residences to exceed rural residences.” is not accurate. The phrase “emphasizing elements and themes” is a vague description of what constitutes a rural vs. urban lifestyle compared to the Community Plan which specifically foresaw and put policies in place to define the rural community character.

Policy CM-10.2.1: "Require all proposed new development to use septic systems with one septic system per dwelling unit". Inconsistent as Valiano GPA to utilize a central sewer system to support the high density small lot suburban development.

#### **F. LAND USE – Inconsistent with the General Plan**

Excerpts (shown in italics) from the current SD County General Plan:

p. 2-3. *We will continue to avoid or minimize developing in areas susceptible to geologic, wildfire, and flooding risks and we will continue to retain and protect the viability of our woodlands, riparian corridors, and important plant and animal habitats, maintaining the health and viability of declining species.*

This is from the GP Guiding Principal 2, and directs projects located in areas susceptible to wildfires, such as this project site, to have minimal development; the Valiano GPA to allow a several hundred percent up zone would be inconsistent.

p. 2-9 ***Guiding Principle 3 Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.***

*As the County continues to grow, it is critical that development be located, scaled, and designed to retain and enhance the qualities that distinguish its communities. Development planning must consider uses; parcel sizes; building form, scale, massing, and architecture; landscapes; and site development practices that are comparable to, or transition with, existing development to ensure that new development "fits" with the community.*

The Project is inconsistent with Guiding Principal 3 because with its clustered design and small lots (as small as 5,000 sq ft), it does not scale development to be comparable with existing large lot development to fit with the rural and estate lot surroundings.

p. 2-11 ***Guiding Principle 5 Ensure that development accounts for physical constraints and the natural hazards of the land.***

*New development should be located and designed to protect life and property from these and similar hazards. In high risk areas, development should be prohibited or restricted in type and/or density*

Again, the Project GPA is inconsistent with Guiding Principal 5 because it locates higher density development in a high fire risk area greatly exceeding the density identified and allowed for this area in the current GP.

p. 2-13 ***Guiding Principle 8 Preserve agriculture as an integral component of the region's economy, character, and open space network. Permitted densities in prime agricultural areas should be reduced to sustain sufficient parcel size for viable agricultural activities.***

The Project is inconsistent with Guiding Principal 8 because it eliminates 118 multi-acre parcel sizes adequate to maintain small family owned farms, specifically encouraged in the EFHG Community Plan, and preserves only 36.5 acres of avocado grove, for a loss of 84% (202.5 farm land acres) at the project site. In addition, small family owned farms are more conducive to variable agricultural activities than are large acreage, monocrop farms such as an avocado grove.

p. 2-14 ***Guiding Principle 10 Recognize community and stakeholder interests while striving for consensus. The residents of San Diego County's unincorporated communities and rural areas have chosen to live here largely due to its environmental setting of hillsides, valleys, deserts, and agriculture; low-density rural character; absence of congestion and pollution; friendliness of neighbors; and pace of life that contribute to a high quality of life distinct from the urbanized environment of coastal San Diego and adjoining inland areas. As growth continues, development must be managed to protect these assets.***

The Project is inconsistent with Guiding Principal 10 because it is inconsistent with the Community Character and Community Vision as detailed in the EFHG Community Plan and as such has not yet reached consensus with the greater

community interests. The applicant should continue to work with the community to design a development that preserves community goals while accommodating growth.

**p. 3-6 Community Development model**

*The Community Development Model directs the highest intensities and greatest mix of uses to Village areas, while directing lower-intensity uses, such as estate-style residential lots and agricultural operations, to Semi-Rural areas. Semi-Rural areas often function as a transition between the Village and Rural Lands categories, providing opportunities for development, but without the intensity and level of public services expected in Villages and with design approaches that blend the development with the natural landscape. Residential development within Semi-Rural areas is not typically served by municipal sewer systems, but is often served by municipal water systems especially where water-intensive crops such as avocado and citrus are common.*

The project does not even mention the local CDM nor its own position in this County-approved development pattern, that is, in the semi-rural periphery defined above as “lower-intensity uses, such as estate-style residential lots and agricultural operations”. The clustered design and small lots are by this definition inconsistent with the placement of the project homes in the semi-rural periphery, and its associated cumulative effects on future development should be studied and mitigated. If the applicant feels that having small lots in a clustered design but with rural themes will be a suitable substitute for “estate-style lots” in a semi-rural area they must provide research-based evidence to support this claim.

**LU-2.4 Relationship of Land Uses to Community Character.** *Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.*

As noted elsewhere, the project is inconsistent with several Community Plan goals and policies and therefore is also inconsistent with General Plan **Policy LU-2.4**. This inconsistency should be noted and mitigated.

**PROJECT ALTERNATIVES:**

The DEIR does not analyze an alternative project on this site that matches the character of the adjoining rural and estate lot neighborhoods. Instead the “environmental superior alternative” is a “reduced grading” version, which eliminates 6 lots and 7 cul-de-sacs lots, whereas both the General Plan and the Septic Only version have markedly fewer impacts. The “septic only” version only includes only 5 BR homes on 5 acres minimum lots, which does not match the surrounding properties that all operate on septic with many different lot sizes and numbers of bedroom.

The revised EIR should evaluate a version more in line with the existing community character, with the following criteria:

- Similar in look and feel to the surrounding rural and estate residential homes in both County and San Marcos that are within the community view shed.
- Mix of 2- to 5- bedrooms
- Range of lot sizes
- Implementing alternative sewer systems as well as conventional septic systems
- Minimal grading and land form modification
- Biological open space contained within a separate lot as opposed to “backyard open space” whose functionality can more easily be compromised.
- 2-acre minimum lots on the portion of the site that has prime soils, to reduce agricultural impacts.
- Incorporating a dedicated agricultural easement over the portion of those lots that remains usable for agriculture, which would be counted as mitigation and potentially eliminate the need to purchase off-site mitigation.

An alternative septic only project with these criteria would likely meet some of the Project Objectives, such as providing a range of home sizes.

**Suggested Alternative Project to be analyzed in recirculated DEIR**

A “septic-system” hybrid design with varied home sizes featuring a mix of 2- to 5- bedroom homes with on varying lot sizes. Newly approved advanced treatment septic system units should be used as required to reach GP allowed density.

Streets should be arranged on a grid pattern rather than a network of cul-de-sacs, where possible, extending existing streets so new Valiano neighborhoods can integrate more easily with existing residents on similarly sized larger lots. Smaller lots would be oriented more centrally (away from existing residents) where possible. No sewage treatment facility to be allowed in Valiano neighborhood 5, as per EFHG Community Plan. Any such facility in Eden Valley would have to be surrounded by Valiano project homes in order to shield existing residents from adverse impacts of such a facility, because Eden Valley residents receive no benefit and should have only minimal exposure to the project impacts.

A majority of project homes should allow horse keeping, like the surrounding community, and a public trail system to connect all homes to the larger regional trails. Equestrian lots should be sized appropriately to accommodate all necessary horse keeping requirements such as feed storage, animal waste storage and horse trailer parking. No additional community amenities are necessary such as landscaping, but if provided, there should be provision to share, on a paid basis, with the existing residents. There should be no community-wide gates or walls, and the portion of the development in Harmony Grove should be associated with the name “Harmony Grove” and the portion in Eden Valley should be associated with the name “Eden Valley”.

Multilevel homes can be designed to follow the natural grade of the land to the greatest extent possible to reduce the amount of grading or blasting required and thus reduce impacts to the environment and existing neighbors. This would also match some of the designs currently used by the existing homes both in Eden Valley, Harmony Grove and the San Marcos Coronado Hills. Instead of creating large flat “yard” space through extensive grading and blasting, recreational space is provided by large balconies and decks that provide desirable views, are easier to maintain than high water use lawns, and can reduce fire risk by utilizing flame retardant construction materials.

### **Improvements to Existing Roads and Chronic Traffic Congestion**

As indicated on the DEIR, the private streets of Mt. Whitney Road and Eden Valley Lane are the primary access points into the proposed new 326 home subdivision. Both streets feed on to Country Club Lane, a public road, placing the burden of all Valiano traffic on Country Club Lane. The DEIR should describe an alternative utilizing an additional access point to La Moree Road to the north, thus taking the burden of all Valiano traffic off Country Club Lane.

Mt. Whitney Road and Eden Valley Lane do not meet current County Private Road Standards. The DEIR does not describe how the residents along Eden Valley Lane will be mitigated for the impacts to bring the Lane up to current private road standards.

For years, serious chronic traffic congestion has existed to the north of Eden Valley where the northern terminus of Country Club Lane ends at Auto Parkway. The combination of the Citracado Parkway Industrial Park, Mission Road, the Sprinter light rail line, CA 78 Freeway, and the Nordahl Road shopping district, which includes Walmart and COSTCO, has been and continues to be a chronic traffic bottleneck.

The DEIR should recognize this chronic traffic situation and determine whether the added ADTs generated by Valiano can be mitigated or not.

### **Addressing the California Drought**

The DEIR should address the additional water use to be generated by the proposed 326 du Valiano Project. Besides the immediate requirements to reduce water consumption by 25-45% by state and local officials, the drought has brought a new awareness to modify lifestyle over the long-term as it pertains to water consumption, landscaping, agriculture, as well as industrial use of water. The DEIR should describe the mitigation the applicant proposes on the impact of additional water consumption by 326 new residential units.

## JUSTIFICATION FOR GPA:

The current San Diego County General Plan, page 1-15, states:

*The General Plan is intended to be a dynamic document and must be periodically updated to respond to changing community needs. An annual review of the Plan is required to ensure that it remains relevant. Moreover, any of the Plan's mandatory elements may be amended up to four times a year. Any proposed amendment will be reviewed to ensure that the change is in the public interest and would not be detrimental to public health, safety, and welfare.*

This information contained in this DEIR does not identify the "changing community need" that is the first requirement for the GPA. It also does not demonstrate that the change is in the public interest; and does not demonstrate that the project would *not* be detrimental to public health, safety, and welfare.

### Impacts to adjoining cities:

The DEIR acknowledges that air quality will be an unmitigable impact, as will noise from construction. In addition to the rural residents of Eden Valley and Harmony Grove, Escondido and San Marcos residents will be affected by the additional traffic, not analyzed in this EIR. The closest San Marcos residents, in Coronado Hills, will see their views of open space impacted by the Valiano development as well as endure the noise and disruption of heavy construction including blasting. On build out, the Valiano small lot subdivision will be inconsistent with the adjacent Coronado Hills estate size lots.

**The project potential to be detriment to public health, safety and welfare** because of the extraordinary fire safety issues surrounding evacuation in a highly impacted and constrained valley. Recent history with the Coco's fire, as well as 12 other major fires in the area since 1980, was not analyzed in the DEIR. The Coco's fire conflagration demonstrates acute issues with evacuation through Country Club Drive, Kuana Laua and Harmony Grove Road, without accounting for any of the additional 750 du HGV residents.

Respectfully submitted by,  
Douglas Dill  
Vice Chair, Seat 15  
San Dieguito Planning Group



This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)