

Ehsan, Beth

From: Betty Anderson <bettypageanderson@yahoo.com>
Sent: Monday, June 15, 2015 3:01 PM
To: Ehsan, Beth; Sibbet, David; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark
Cc: Betty Anderson; Fitzpatrick, Lisa
Subject: Valiano Draft EIR - Please keep it rural!

To: County Planning and Development Services (PDS) Staff:

. My name is Betty Anderson and up until the time of the Coco's Fire last year, I have lived in Harmony Grove since 2008. Unfortunately, I lost my home and all its belongings due to the fire on May 15, 2014. I currently live in a rental home in Escondido and plan on rebuilding my home in Harmony Grove at 2925 Grandview, Escondido, CA, 92029.

I am writing to you today regarding the Draft EIR for the Valiano project and ask you to not allow the proposed increased density.

Our community plan calls for a rural community with rural zoning and a rural environment. The applicant claims it is a semi-rural development with rural themes. Their vision includes houses tightly clustered together, small lots, a sewage plant, 20-50 foot retaining walls, street lights and cul-de-sacs. This does not come close to rural, in my opinion. My definition of rural is wide open spaces (acreage, not square footage) and a horse friendly environment. Our community plan calls for septic, not sewage treatment plants (again, not rural).

I am very concerned about the impacts that this project will have on my safety and those of my community.

This area is only zoned for 118 houses. Valiano is proposing 326 houses with a possible increase to 350 houses if "secondary dwelling" houses are allowed. This will make evacuation a very difficult proposition. I am concerned about any future fires and the plans for evacuation of people and horse trailers. Country Club Rd, Harmony Grove Rd and Elfin Forest Rd are only two lane roads, which is way too narrow to accommodate all these cars during an evacuation, not to mention fire prevention vehicles. Traffic bottlenecks at Kuauna Loa and Country Club Rd and also at San Elijo Hills Rd and Elfin Forest Rd. The Sprinter closes off Auto Parkway when it goes by. Citracado Parkway does not go all the way through to the 15 freeway.

The new proposed construction calls for a large amount of blasting and grading for a period of at least 2 years. My community was negatively affected by the blasting that was done for the Harmony Grove Village development. The blasting caused my home to rumble, my pets were anxious and Harmony Grove Rd traffic was stopped for periods of time. It was quite disturbing to hear the blasting.

I thank you for your time and consideration of not allowing increased housing for the Valiano project. Please, keep it rural.

Sincerely,
Betty Anderson
1726 Tobacco Rd
Escondido, CA 92026
760-315-2216

cc: County Planning Commission
County Board of Supervisors
San Dieguito Planning Group
Elfin Forest/Harmony Grove Town Council

Ehsan, Beth

From: Eric Anderson <erictanderson02@yahoo.com>
Sent: Monday, June 15, 2015 4:00 PM
To: Ehsan, Beth
Cc: J. Arsivaud; Horn, Bill
Subject: Valiano DIER Cumulative Agriculture impacts

Dear Beth Ehan

I would recommend that the section of the Cumulative Impact to Farm Sites portion (page 2,3-35), Ref the Anderson TM and TPM. This project results in five 2+ acre parcels on which the established commercial nursery operation will continue. It was not terminated by the TM or TPM nor is it a condition of the Final map, in fact if you examine the TPM the ongoing uses are designed in. Some of the parcels will be sold for family estate reasons but there is nothing to stop agriculture from continuing, in fact the the two acre plus sized parcels accomodate this. Something Valiano has an opportunity to do espeically on the soils areas that meet the state defintion and in San Diego are extremely rare. The agriculture onsite opportunities would continue when the projects design two acre parcels minimums. In fact a good example was a previous 4 parcel map finalized by Anderson of the same Biophilia ranch site. All continue to support ongoing commerical agriculture operations. (one of the parcels was out of commercial production over twenty years but now has a lemon grove. Very little of those sites were rated well under the normal county agriculture analysis but with the good climate in Elfin Forest, CWA service for water and the larger parcels show that the traditional county evaluation of agriculture is flawed and that the over 100 acres of agriculture sites in Valiano should contemplate additional acreage in the analysis. Some of the crops on the Anderson nursery site are no longer viable with high water costs and so the opertaion will be smaller but continue and there is no telling what the future owners will do. I hope this point is not lost on the land use consultants of Valiano. Eden Valley is a very viable location for ongiong intensive commercial agriculture and equestrian uses.

Respectfully
Eric Anderson

Farmer Elfin Forest (and point person for the Anderson family on the TPM.)

Ehsan, Beth

From: Sandra Bartsch <sandra@sbeventprod.com>
Sent: Saturday, June 13, 2015 8:05 AM
To: Sibbet, David; Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark
Cc: Fitzpatrick, Lisa; Cox, Greg; dianne.jacobs@sdcounty.ca.gov; Roberts, Dave; ron-robbers@sdcounty.ca.gov; Horn, Bill; bruce.bettyliska@gmail.com; douglas.dill@att.net; EFHGTC
Subject: Proposed Valiano Development - DRAFT EIR Comment - Opposition

To:
San Diego County Planning and Development Services Staff:

Reference:

Valiano Draft Environmental Impact Report: PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2014-MUP-14-019, PDS2013-STP-13-003, PDS2013-ER-13-08-002

I am a resident of Elfin Forest and I strongly oppose the Valiano Project as proposed for the following reasons:

1. Safety in Case of Fire - Evacuation routes.

We live in an extremely fire prone area. The ability to evacuate in a quick manner when a wildfire occurs, is critical to us and our animals and frankly to our survival. The Cocos Fire that happened in May 2014 has heavily affected the Harmony Grove area and is a good example of how residents of our valley have to be able to get out quickly. I had to evacuate with my husband and 7 year old son, take our horses and other animals. As we were trying to leave the area we found that the escape route through San Elijo Hills was gridlocked (because of a mandatory evacuation order they had) so we had to turn around and go through Harmony Grove towards Escondido. Thankfully Harmony Grove Village had not been built out at that time. Once Harmony Grove Village will be fully developed, both of our evacuation routes will be heavily populated and we will have bottlenecks on both ends of our valley. It scares me to think what will happen if mandatory evacuation orders are in tact on both ends of our Valley at the same time. We may literally get trapped.

Any further increase in density on the Harmony Grove/Eden Valley side of our Valley will just contribute even more to this problem. I think allowing the Valiano Development to go forward as proposed could result in extremely dangerous and potentially life-threatening situations for residents of Elfin Forest and Harmony Grove in a fire situation like we had last May.

2. Community Character

As defined in our community plan, we are a rural community. Allowing Valiano to go forward as planned violates our community plan and would tip the scale of urban vs. rural residencies. Harmony Grove/Eden Valley could no longer be called a rural community.

3. General Plan

Many people worked very hard and very long on the County's new General Plan. It needs to be adhered to. I am aware that a General Plan allows for amendments, but I would expect that amendments are only granted under very exceptional circumstances, when there is a clear benefit or necessity to the general public and/or the environment and/or to the greater good. I do not see any justification in this case why the General Plan should be amended.

4. Traffic

The Valiano project as proposed has serious traffic implication (see also point 1 above). It has a single egress on a two lane road, Country Club Lane will be impacted to a point where we will see constant bumper to bumper like traffic.

5. Noise impact on the neighborhood and live stock

The noise impact on neighboring residence and their livestock during construction is unacceptable, especially considering that it has been the same neighbors that have been impacted and continue to be impacted by blasting and construction noise of the Harmony Grove Village.

6. Water Shortage and Drought

It seems counter-intuitive to allow any increase in density to the General Plan during a multi year drought when the State has announced unprecedented mandatory water conservation measures.

I trust that you will make the right decision and advise against this Project as proposed. It is wrong on many, many levels.

A handwritten signature in black ink, appearing to read "Sandra Bartsch". The signature is written in a cursive, flowing style.

Sincerely,
Sandra Bartsch

7753 Camino Sereno
Escondido, CA 92029

Ehsan, Beth

From: Jack Batchie <jackbatchie@yahoo.com>
Sent: Sunday, May 17, 2015 3:00 PM
To: Ehsan, Beth
Subject: Re: FW: Valiano Specific Plan PDS2013-SP-13-001 Notice of Public Review

Hi Beth,

Please accept the following comment regarding the Valiano Specific Plan

My wife and I are San Diego County residents living at 2958 Mount Whitney Rd. The below sentence highlighted in red is untrue. A stop sign DOES exist on Mount Whitney and was installed last year after roadwork was done on Country Club Drive to remove the curves south of the intersection at Mount Whitney.

TRANSPORTATION TRAFFIC 2,8
2.8.2.5 Unsignalized Intersections
Page 2.8-15

In accordance with County Private and Public Road Standards, a review of the sight distance standards at Project access locations on Country Club Drive shall be done and adequate sight distance meeting County standards shall be provided or a specific design exception shall be granted by DPW. **In addition, a stop sign shall be installed on Mt. Whitney Road where one does not exist today**, when warrants are met, and northbound left-turn pockets shall be installed at each of the four access locations. As a result, **impacts to unsignalized intersections under Existing Plus Project conditions would be less than significant.**

This proposal is unacceptable. The intersection **today** is a hazard for vehicles on Mount Whitney pulling out onto Country Club. Frequently vehicles travel northbound and southbound on Country Club at a high rate of speed. This present hazard will be multiplied several times with Mount Whitney in its present configuration proposed as a main thoroughfare to access the Valiano housing project. The hazard will increase even more with additional traffic on Country Club due to the Harmony Grove 700+ units housing project which is now under construction. An alternate design must be made to ensure the safety of vehicles entering the intersection from Mount Whitney Rd.

Notwithstanding, I cannot imagine the traffic problems that we will encounter at the intersection of Mount Whitney and Country Club with the intersection of Kuana Loa and Country Club being only a few hundred feet north.

Respectfully Submitted
John M. Batchie
2958 Mount Whitney Rd.

From: "Ehsan, Beth" <Beth.Ehsan@sdcounty.ca.gov>
To: Jack Batchie <jackbatchie@yahoo.com>
Sent: Thursday, May 14, 2015 9:21 AM
Subject: RE: FW: Valiano Specific Plan PDS2013-SP-13-001 Notice of Public Review

You can send them to me, at this same email address.

Thanks,
Beth

Beth Ehsan
Planning & Development Services
858-694-3103

-----Original Message-----

From: Jack Batchie [mailto:jackbatchie@yahoo.com]

Sent: Wednesday, May 13, 2015 10:09 AM

To: Ehsan, Beth

Subject: Re: FW: Valiano Specific Plan PDS2013-SP-13-001 Notice of Public Review

Hi Beth,

I have prepared comments for the Valiano Specific Plan. Where do I email my comments ? Thank you.

Respectfully

John M. Batchie

2958 Mount Whitney Rd.

Ehsan, Beth

From: B Batterson <bbatterson1@gmail.com>
Sent: Sunday, May 24, 2015 8:41 AM
To: Ehsan, Beth
Subject: Proposed Valiant development

Dear Ms. Ehsan:

Since I was unable to appear in person, to the meeting regarding this issue, I would like to voice my concerns regarding the proposed Valiant development project.

Having evacuated from my home both in 2007 and last year, I am familiar with the logistics of leaving this neighborhood under a potential disaster situation. The traffic was greatly congested, taking 23 minutes for a 2.8 mile drive to reach I-15 from my home.

I can only imagine the situation now that Harmony Grove Village is nearing completion with its 400+ homes. The roads being put in will not be adequate should an evacuation emergency occur.

To go forward with yet another [Valiant] development project would further put everyone at risk under another [and most likely] occurrence to evacuate the area. Additionally, new homes require a certain number and amount of infrastructure to sustain the increased community. Schools and businesses would need to be provided in support of the increased population, for which we simply do not have the road structure to accommodate.

However, despite the serious aspects of the above, **what I consider even more problematic pertains to water**. To continue building in the midst of our severe lack of water, is unconscionable.

Those already established in our homes are asked to make dramatic changes, from irrigation to showers, laundry and doing dishes, in our use of this precious commodity. Not only are tens of thousands of dollars worth of landscapes being put to ruin, but our daily lives must be greatly altered in order to meet the new controls. All this is before the Harmony Grove Village homes have even been occupied. We can expect, with that new development, more schools and businesses will be needed, or need to be expanded.....and they will further add to the demand for water usage, beyond the residential use, in our drought stricken state.

To add yet another development...the Valiant project....to this already fragile situation, should be the last thing on the minds of those with any common sense.

This is not a difficult decision to make...simply one of supply and demand. The demand would be *greatly* increased for a supply that is rapidly dwindling and is not expected to recover any time soon.

I hope you will relay this information...and my concerns...to those making the final decision, and to not go forward with the Valiant development project.

Thank you.

Best regards,
B.W. Batterson

B.W. Batterson

,
M.S., M.A.

BBatterson1@gmail.com

Pacific Play Systems, Inc. (Owner)
3226 Grey Hawk Court
Carlsbad, CA 92010
222-102-31-00 (Property on Seeforever Dr., San Marcos)
760/855-3688

June 15, 2015

Beth Ehsan
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

RE: Proposed Valiano Development Project/Eden Valley

Dear Ms. Ehsan,

A year ago, we communicated our concerns to the County regarding Standard Pacific's proposed major grading permit application for the Harmony Grove project, which as you know is just adjacent to the proposed Valiano project. We are leaving reference to the Harmony Grove project and its developer, Standard Pacific in this letter because the concerns remain the same.

Quality of Life: Residents of Coronado Hills and Eden Valley have chosen to live in this unique area for the natural beauty of the surroundings, the peace and quiet, the tranquility, the clean air and dark night skies, the amazing wildlife including mountain lions, deer, an endless number of species of birds including the golden eagle and many more species of animals. **With this development, especially if the zoning is allowed to be changed to a higher density, all of these beautiful things inherent to this very unique place will be threatened.**

Some time ago, Standard Pacific drained the small lake located in the NW part of this project in Phase 2 that had served as a watering hole and home for the wildlife and birds, etc., for at least the last 25-30 years and possibly longer. **With this one action, an entire ecosystem was wiped out!** How was this allowed to happen? It appears that both the County and the developer have failed to do their homework! As we understand, there might be similar ponds in the proposed development.

In addition, this small lake served as a natural catch basin for the winter rains as they drained off the mountain and our property...has this issue even been looked at or considered? Where is the rain water coming out of the two drain channels from our property going to go?

Safety of the residents: The Cocos fire disaster/emergency in our community illustrated one of the many negative, even life threatening effects of increased population in this confined area. Even with the improvements of Twin Oaks Valley Road (a 6 lane highway) there was so much gridlock immediately after the Cocos fire broke out that we could not even access our neighborhood (Coronado Hills which has only one entrance/exit via Coronado Hills Drive) in order to reach an ill family member. Fortunately, the fire took several more hours to travel down the back side of the mountain to our home and eventually we were able to get our family member evacuated.

Even with improvements to the roads leading in and out of Eden Valley and Harmony Grove, the gridlock, panic and danger experienced during the Cocos fire will no doubt be repeated in this small valley when another disaster strikes and the safety of all who reside in this area will be put at great risk...we've experienced it firsthand and it is not a subject to take lightly! Even with improvements, this area cannot handle the increased population and traffic that this development would bring, in short, it will be an absolute disaster for this quiet rural area and put all of the residents at risk!

Security of Farming Operation: We have lived on Seeforever Drive in Coronado Hills for 25 years now and two of our parcels (one approx. 4 acres, one 5 acres) run directly adjacent to the proposed Valiano development. In fact it appears they are proposing approximately 7 lots that will run right up against our one of our parcels. This is unacceptable and an upzone in the density of homes should not be allowed! The people that have come to live in Coronado Hills and the surrounding areas have come and invested in multi-acre properties and to avoid having the density of homes that is being proposed here.

The EIR states that the Valiano project is trying to stay consistent with the adjacent Harmony Grove project. We believe this to be an incorrect statement as the lot sizes proposed in the Harmony Grove project at the very northern end towards Coronado Hills (and adjacent to one of our parcels) as we understand are to be anywhere from one to four acres, a far cry from Valiano's proposed SR 0.5 designation that will run adjacent to our eastern property lines.

We also have a commercial agricultural operation (avocado grove) and are extremely concerned about the loss of security, privacy, etc., that this project will create for us. How does the developer propose to safeguard our property from the multitude of homes that they are proposing??

Thank you for your prompt attention to these critical matters.

Sincerely,

Ali Bemanian

Vista Pacific, LP (Owner)
3226 Grey Hawk Court
Carlsbad, CA 92010
222-102-27-00 (Avocado grove on Seeforever Dr., San Marcos)
760/855-3688

June 15, 2015

Beth Ehsan
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

RE: Proposed Valiano Development Project/Eden Valley

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Some time ago, Standard Pacific drained the small lake located in the NW part of this project in Phase 2 that had served as a watering hole and home for the wildlife and birds, etc., for at least the last 25-30 years and possibly longer. **With this one action, an entire ecosystem was wiped out!** How was this allowed to happen? It appears that both the County and the developer have failed to do their homework! As we understand, there might be similar ponds in the proposed Valiano development.

In addition, this small lake served as a natural catch basin for the winter rains as they drained off the mountain and our property...has this issue even been looked at or considered? Where is the rain water coming out of the two drain channels from our property going to go?

Safety of the residents: The Cocos fire disaster/emergency in our community illustrated one of the many negative, even life threatening effects of increased population in this confined area. Even with the improvements of Twin Oaks Valley Road (a 6 lane highway) there was so much gridlock immediately after the Cocos fire broke out that we could not even access our neighborhood (Coronado Hills which has only one entrance/exit via Coronado Hills Drive) in order to reach an ill family member. Fortunately, the fire took several more hours to travel down the back side of the mountain to our home and eventually we were able to get our family member evacuated.

Even with improvements to the roads leading in and out of Eden Valley and Harmony Grove, the gridlock, panic and danger experienced during the Cocos fire will no doubt be repeated in this small valley when another disaster strikes and the safety of all who reside in this area will be put at great risk...we've experienced it firsthand and it is not a subject to take lightly! Even with improvements, this area cannot handle the increased population and traffic that this development would bring, in short, it will be an absolute disaster for this quiet rural area and put all of the residents at risk!

Security of Farming Operation: We have lived on Seeforever Drive in Coronado Hills for 25 years now and two of our parcels (one approx. 4 acres, one 5 acres) run directly adjacent to the proposed Valiano development. In fact it appears they are proposing approximately 7 lots that will run right up against our one of our parcels. This is unacceptable and an upzone in the density of homes should not be allowed! The people that have come to live in Coronado Hills and the surrounding areas have come and invested in multi-acre properties and to avoid having the density of homes that is being proposed here.

The EIR states that the Valiano project is trying to stay consistent with the adjacent Harmony Grove project. We believe this to be an incorrect statement as the lot sizes proposed in the Harmony Grove project at the very northern end towards Coronado Hills (and adjacent to one of our parcels) as we understand are to be anywhere from one to four acres, a far cry from Valiano's proposed SR 0.5 designation that will run adjacent to our eastern property lines.

We also have a commercial agricultural operation (avocado grove) and are extremely concerned about the loss of security, privacy, etc., that this project will create for us. How does the developer propose to safeguard our property from the multitude of homes that they are proposing??

Thank you for your prompt attention to these critical matters.

Sincerely,

Ali Bemanian

Bemanian
575 Seeforever Drive
San Marcos, CA 92078
222-102-26-00
760/855-3687

June 15, 2015

Beth Ehsan
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

RE: Proposed Valiano Development Project/Eden Valley

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Some time ago, Standard Pacific drained the small lake located in the NW part of this project in Phase 2 that had served as a watering hole and home for the wildlife and birds, etc., for at least the last 25-30 years and possibly longer. **With this one action, an entire ecosystem was wiped out!** How was this allowed to happen? It appears that both the County and the developer have failed to do their homework! As we understand, there might be similar ponds in the proposed Valiano development.

In addition, this small lake served as a natural catch basin for the winter rains as they drained off the mountain and our property...has this issue even been looked at or considered? Where is the rain water coming out of the two drain channels from our property going to go?

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The EIR states that the Valiano project is trying to stay consistent with the adjacent Harmony Grove project. We believe this to be an incorrect statement as the lot sizes proposed in the Harmony Grove project at the very northern end towards Coronado Hills (and adjacent to one of our parcels) as we understand are to be anywhere from one to four acres, a far cry from Valiano's proposed SR 0.5 designation that will run adjacent to our eastern property lines.

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Thank you for your prompt attention to these critical matters.

Sincerely,

Elizabeth Bemanian

Bemanian
575 Seeforever Drive
San Marcos, CA 92078
222-102-22-00
760/855-3687

June 15, 2015

Beth Ehsan
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
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Security of Farming Operation: We have lived on Seeforever Drive in Coronado Hills for 25 years now and two of our parcels (one approx. 4 acres, one 5 acres) run directly adjacent to the proposed Valiano development. In fact it appears they are proposing approximately 7 lots that will run right up against our one of our parcels. This is unacceptable and an upzone in the density of homes should not be allowed! The people that have come to live in Coronado Hills and the surrounding areas have come and invested in multi-acre properties and to avoid having the density of homes that is being proposed here.

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Thank you for your prompt attention to these critical matters.

Sincerely,

Elizabeth Bemanian

June 7, 2015

Mary A. Bennett
880 Hailey Court
San Marcos, CA 92078

To: San Diego County Planning and Development Services Staff

Cc: San Diego County Planning Commission; San Diego County Board of Supervisors; Town Council of Elfin Forest Harmony Grove; San Elijo Hills HOA Board of Directors; James Desmond, Mayor of San Marcos; Christine Hurdle, Director San Elijo Hills

To All Concerned:

I am writing to provide comments on the planned Valiano community project and Harmony Grove expansion projects in area between San Marcos and Escondido. I write as a Cocos fire evacuee and lucky survivor of that catastrophe. My concerns and feedback follow:

- **Road Congestion:** North County already suffers from extreme road congestion. Current residents already need to schedule errands and discretionary road trips around school and work rush hours due to road congestion, and still the traffic is often heavy. It makes no sense to add more residents who add to the traffic problems, unless builders are required to implement necessary road improvements before breaking ground.
- **Wildfire Safety Risks:** On May 14, 2014, about 3:30pm, I hurriedly grabbed my two pets and set out to evacuate my Altaire neighborhood due to the imminent threat of the Cocos fire. I drove a short distance to Wild Canyon Road, the only escape route open because the fire cut off the only other route, Double Peak Road. I found myself in a line of traffic that did not move for more than one hour. In that hour, the column of black smoke over the hill in back of the neighborhood thickened and towering flames leaped over the top. Traffic was gridlocked with many of us desperately calling 911 for rescue. For the first time in my life, I thought I was going to die. It appeared that the fast moving fire would sweep down the hill at any minute and we all would die where we sat. If the wind hadn't shifted just at the right time, I am convinced I would not be here now.

The issue of limited evacuation routes is a problem throughout the County, a problem made worse by the road congestion mentioned above. Adding more residents without remedying the traffic infrastructure will only further play roulette with human lives. Will it take a massive loss of life in a future wildfire to finally address the issue? We need more evacuation routes for the current population, not more people to evacuate.

- **Drought:** The California drought is deepening with serious concerns about water shortages for the current population throughout San Diego County. And new communities are being considered? This makes no practical sense. Not only will this put a bigger burden on the water supplies, needed by current residents, it will decrease critical supplies for firefighting.
- **Environmental Impact:** Areas of open land need to be preserved to sustain the ecology, beauty and wildlife habitats of our County. More people and more human use of the land will irreversibly damage or destroy all of these treasures.

It seems clear that those making the decisions about building the Valiano community or expanding Harmony Grove do not live in the areas impacted. Letters like this one would certainly not be necessary if they did. I suggest that before decisions are made about more building, decision makers need to drive through the impacted areas to experience the traffic and ask the locals if the issues cited above are realities. Only then will the right decision against more building be crystal clear.

Sincerely,
Mary A. Bennett
bennetrph@aol.com

Ehsan, Beth

From: Martin Benowitz <marty@lordpufferlaw.com>
Sent: Monday, June 15, 2015 9:44 AM
To: Ehsan, Beth
Cc: Sibbet, David; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark; Fitzpatrick, Lisa; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill; Cox, Greg; efhgtc .
Subject: harmony grove

Ladies and Gentlemen:

You have received the detailed objection of the Elfin Forest Town Council which is done with more elegance and detail, and restraint than I can muster. I guess getting to be 66 years old and living in Elfin Forest for 31 of those years, I'm a little less tolerant and less patient. Political correctness is not my long suit.....so I echo my neighbor's sentiments in full, but want to add my own simple question to you all: Why do we have a community plan if we are only going to chop it up and change the intent every time a developer wishes to make more money by adding density. There are places for density, and places we all agreed should be less dense. That was the plan that many of you were a part of building for the future of this area of North County, so why would you change that plan? There should be areas of horse trails and bike routes that allow for some open spaces. I am a road bicyclist and will not ride on that road through Harmony Grove and Elfin Forest. It is only a matter of time until the next tragedy occurs on that road with its lack of shoulders and bike lanes. Those narrow curves around those rock sidewalls are not meant to handle rush hour traffic, and adding more homes in this area will only aggravate the existing danger.

Do your job please. Stick to the plan that was adopted for this area, and allow building within those parameters.

Martin A. Benowitz
2231 Faraday Avenue, Suite 150
Carlsbad, CA 92008
Tel 760-930-6505; Fax 760-930-0852
marty@lordpufferlaw.com

Ehsan, Beth

From: Colin Black <Colin.Black@kratosdefense.com>
Sent: Monday, June 15, 2015 12:58 PM
To: Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill; Sibbet, David; Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark
Cc: douglas.dill@att.net; bruce.bettyliska@gmail.com; Fitzpatrick, Lisa; efhgtc@gmail.com
Subject: Valiano Draft EIR
Signed By: colin.black@kratosdefense.com

Dear Ms. Ehsan:

First, I want to thank you and your colleagues at Planning and Development Services for all the time and work you've put into reviewing the Valiano project. It really means a great deal to our community and appreciate that you are giving it the due diligence it deserves. My name is Colin Black and I've lived on Elfin Forest Road, in Elfin Forest for a year now. We were attracted to this area due to its tranquility

As you know, the project, as proposed, threatens to destroy the wonderful community we are part of and that has existed, undisturbed for over 125 years. It is a unique and special place in San Diego County, the last of its kind west of the 15, I'm afraid. I am taking the opportunity to provide my comments on the Draft EIR for this project in the hopes that the developer will seek to follow the vision of the General Plan and that of the Community.

The following are my major concerns with the project:

- **General Plan Update:** In the 2000s, the County staff and many members of our community (upwards of 60+ over many many meetings) collaborated on the General Plan Update and it was decided that our community should take "our share of density" to accommodate the growth that SD County would experience over the next 20 years. This is where the Community Development Model was implemented where our share of this density would form part of a denser village and then the density would feather outwards away from the village limit line, in order to protect the rural nature and the values of our community. *We agreed with this compromise.* This project violates that compromise and it violates the Community Development Model as it creates higher density outside the village core after the "feathering out" has occurred. This is significant.
- **Harmony Grove Village:** Then came New Urban West proposing a massive development. We worked with them over several years to come up with a project that fits in with the Community Development Model and our community plan previously elaborated with County Staff. It fulfilled our obligation to accept our fair share of density and growth in San Diego County. We played fair because that is who we are. We are not NIMBYS who reject any and all application. HGV is a clear example of that. AND, it maintained the Community Development model by keeping density in "the village" and feathering out with lower density the further you get away from the village. In fact, the lots to the north of HGV right next to Valiano's proposed area, are large lots (some as big as 10-20 acres), as are virtually every surrounding property to Valiano. The majority of the properties are 1 acre or more. So Valiano violates the word AND the spirit of our community plan and the compromise we made by clustering houses closely together in very high density clusters. To approve this increase in density would be a slap in the

face to the community and, frankly, would destroy any trust our community (and many others) have in our County administration.

- **NC17:** This property had already received an up zone from SR2 to SR1. Then they came back in front of the BOS to ask for yet another up zone to SR0.5. This time, the BOS denied them for the reasons mentioned above: it violates the CDM, this community has already accepted its fair share and it violates the spirit of the agreement we made with county during the general plan process. Now, they are trying a third time to get an up zone. Nothing has changed on the ground since it was rejected the last time. The same logic applies and BOS should not approve this up zone for the same reasons as before.
- **Community Plan:** Our community plan calls for a rural community with rural zoning and rural environment. The applicant claims it is a semi-rural development and claim to have rural themes. If houses tightly clustered together, with 1000 foot walls, 20 feet high, manufactured slopes, street lights, fencing and gates and cul-de-sacs can be defined as rural, I think they are looking at the wrong dictionary. Please, look “rural” up in the dictionary. Valiano is not it. For me, rural means open space, quiet and peaceful road and pleasant views of Barns and livestock. Valiano is none of these things. Not only is this a significant impact but it is an existential impact: our community would be destroyed if Orange County-style developments like Valiano are squeezed into our little bucolic valley.
- **Septic:** Our community plan calls for septic, not sewage treatment plants (again, not rural). This is inconsistent.

In addition, am very concerned about the impacts that this project will have on my safety and those of my community.

- From the DEIR it is clear that they have not taken into account the most recent fire, Cocos Fire. There are few ways in and out of Elfin forest and this can only service to add to the traffic loads. The DEIR states most fires come from the East, when the last few fires, including Coco’s came from the West.
- The 326 houses proposed will make evacuation a very difficult proposition. The DEIR does not show how evacuation will proceed during a wildfire event. The only egress, Country Club Road, will be at LOS F (according to the DEIR) and evacuation on this two lane road will be hazardous and create a fire trap. On the other end of the valley, San Elijo Road (which is a 4 lane road emptying into a 6 lane road) had people sitting in their cars for over an hour as flames were visible overhead on Double Peak. Had the fire not changed direction towards Harmony Grove as they did, you would have had a tragedy on your hands. Country Club is only a 2 lane road with LOS F. It is facing evacuation traffic from 742 houses at HGV, 325 houses at Valiano in addition to the trailers for upwards of 180 horses in Eden Valley.
- The Fire Protection Plan (FPP) makes no mention of evacuating horse trailers and how that would impact evacuation. Please address this. We have twice as many horses in Eden Valley than we have houses. Trailers are slow, hard to maneuver, big and, importantly very hard to load animals on to. There is only one way out of that valley: Country Club Road towards Autopark way. If the fire comes west, like it did during Cocos there will be a massive traffic jam (LOS F means bumper to bumper traffic in non-evacuation circumstances) that could doom residents to a death trap. This is significant and not mitigated.
- The response times from San Marcos Fire District would be 7.5 minutes (above the 5 minutes standard). The DEIR assumes mutual aid from a fire station that hasn’t been funded (at HGV) so that fire station

cannot be used in the analysis. They are offering to pay into that fire station, but not Escondido Fire which will likely be the first responder. This is significant.

- Additionally, they are increasing our risks by asking for (and have already received) a variance on road width on Hill Valley because they don't have easements to widen it. It is not wide enough for two fire trucks to pass side by side. SMFD gives them the variance, but other FD will likely respond (and deal with the safety consequences). **This puts us at more risk as firetrucks will have reduction of access to Hill Valley Road.**
- They are assuming existing home owners will be responsible for Fuel Modification Zones, an encumbrance to those landowners.
- Lastly, the FPP focuses exclusively on the impacts to *the project* but no reference to how it will jeopardize the wellbeing and safety of existing community.

Traffic will increase

- No analysis was made of the traffic heading West towards Elfin Forest Road. We know, from observation, that the traffic flow is more than 6% as stated in the DEIR. There is also a bottle neck at San Elijo Road.
- The intersection of Country Club and Autopark Way (the main ingress and egress of the project) is already majorly congested and I have to wait for almost 15 minutes at peak time already to get onto the main roads from Elfin Forest road . Even now, without HGV built out, we sometimes have to wait two light cycles just to turn left onto Auto Park Way. What's going to happen when all the houses from HGV and Valiano go in? This is an unacceptable, unmitigated impact.
- Furthermore, when the Sprinter comes by every 30 minutes (and soon, it will come every 15 minutes, according to NCT) it becomes even more congested. This impact is significant and unmitigated properly in the plan.
- Citracado Parkway has not been funded yet and there is no indication as to when it might come online. The traffic study doesn't reflect that correctly.
- The sight lines at the intersection of Mt. Whitney and Country Club as well as those at Hill Valley and County Club do not meet county standards.

We have a barn and multiple horses right next to elfin forest road...

The applicant's attempt at incorporating a small number of equestrian lots to somehow check the box on rural and equestrian fails on a number of levels.

- First, there aren't enough equestrian lots. We are an equestrian community and outnumbering equestrian houses with non-equestrian houses will tip the balance against horse-keeping and more towards suburban living.
- Shoe-horning horses and stalls onto 1/3 acre lots along with a two story house and garage makes it less likely that the property will be used for horse-keeping. There is barely enough space for a horse to be kept humanely.

- A horse eats at least 600 pounds of hay a month and produces 500 pounds of manure and soiled bedding every week. On a 1/3 acre lot, there is really no place to pile manure or store hay in a safe manner. Hay, if not kept correctly, can spontaneously combust. It is the cause for many a barn fire.

I trust that you will review this plan and reject it for its inconsistencies and inaccuracies

Colin Black

Colin Black

Chief Information Officer

Kratos Defense & Security Solutions, Inc.

4820 Eastgate Mall

San Diego, CA 92121

Direct: 858-812-7385

www.kratosdefense.com

KRATOS

Ehsan, Beth

From: amy@cahillmindbody.com <amyagualibre@gmail.com>
Sent: Monday, June 15, 2015 2:10 PM
To: Sibbet, David
Cc: Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; bruce.bettyliska@gmail.com; Douglas Dill; Horn, Bill; Ron-Roberts; Roberts, Dave; Jacob, Dianne; Cox, Greg; efhgtc
Subject: Valiano Draft EIR: Comments from the Cahill's in the Elfin Forest

Dear Mr. Sibbet,

I hope this email finds you well and enjoying our cooler weather thus far this year. My husband and I wish to thank you and your colleagues at Planning and Development Services for all the work and attention you have put toward the review of the Valiano Project. We greatly value your efforts in helping us continue to live in our beautiful community of San Diego and for keeping as much of this area unique to the county, and safe place to live. Please allow us to introduce ourselves, my name Amy Cahill and my husband is Jim Cahill and we live on Questhaven Rd, off of Elfin Forest Road/Harmony Grove Road, in the Elfin Forest. We have lived here for 3 years and have enjoyed the area for over 20 years. Thus we have seen the development the area has experienced for over a long period of time, even though we have only lived here for the past 3 years.

We moved to this area because we wanted to live in a rural area. We love that this community has a stated vision of "keeping it rural", particularly in this ever-expanding and developing era. This community is unique. We have lived all over San Diego county (Jim was born in Coronado), and all over the world. This is the first place we have lived that focuses on this aspect of living as specifically stated goal, and a community that works together to take care of not only one another, but the natural environment and it's other living beings.

San Elijo Hills and Harmony Grove Village were rather shocking developments to witness come to fruition, as the planning of these communities are so poorly executed in terms of the issues that continue to concern us with the Valiano Project. So to add yet another development to the area, with the same lack of consideration for very specific issues is overwhelming to us. To keep this from becoming a tome :), we will focus on two issues that stand out so blatantly they cannot be ignored and are of grave concern for general safety and well-being, let alone to the issue of "keeping it rural."

Traffic and Fire Safety

After reading the Transportation section of the EIR carefully we found NO reference to the use of the Elfin Forest Road by the Valiano community heading West. All of the references to traffic flow point to roads and freeways to the East. This is a major oversight. The road WILL be used. The 6% that is stated as used in the DEIR is simply wrong. We witness this every day. Not only do individuals use this road A LOT, and particularly on weekends when heading to the beaches, this road is used by many bicyclists and motorcycles and car enthusiasts (all of whom use this road like a racetrack). The dangers of this road are apparent daily, with people driving way over the speed limit, constant passing into the other lane over the double yellow lines, and bottlenecks at any intersections with lights. This is well known to every CHP office we have spoken with. The noise is also substantial, particularly when speeding vehicles overtake one another. Not only will this traffic impact our lives with time constraints, noise, and a likely increase in accidents (as it is only two lanes, very dark at night, and very windy), it will become a death trap if there is another fire in the area.

This is FIRE country. It is a risk we all recognize when we choose to live here. The fires that come to San Diego county come from the East, which means that everyone will be evacuating West. It is appalling that this is not addressed in this report. We have lived through many fire evacuations both in San Diego county and in

our time living in Western Australia. We are fortunate in the United States to not have had people burn to death in their cars on roads, but Australia has had to bear this many times. We are nearing the level of fire threat that Australia has lived with for some time. Our fires in California are at this level, they will burn hotter and faster, and this is reported upon almost daily now with our massive drought. During the Coco's fire in May of 2014 we evacuated early, yet there were still bottlenecks that were difficult to avoid. The fact that the largest mass migration from a city came in the massive fire in 2007 (over one million people evacuated from San Diego county) should set off alarm bells immediately in all those thinking about building new developments. But apparently this was ignored in the EIR for the Valiano Development. Please consider this life threatening issue when you review this development proposal. Again, we choose to live here and we understand the risks, but unknowing individuals thinking they can evacuate East, or even quickly, are in for surprise of their life, or with great possibility, the end of their lives. Jim worked as a lifeguard for many years and I have worked as a Red Cross evacuation center manager in earthquake areas and we have witnessed the panic and the helplessness of average people having to deal with emergencies. These are practical realities that we know well.

Please do not hesitate to contact us directly at the phone numbers listed below if you would like to hear further comments or information on how this development will impact our lives.

Thank you again for your time and attention to our concerns and our concerns for all our fellow citizens, both human and non-human, in San Diego county.

Finally, this is an island of rural life left in Coastal Southern California. Our children and future generations will rightly judge us based on our efforts and decisions made today. Let us choose truth, honor, wisdom, and kindness over mindless development and the blindness of greed as we move forward. May it be so.

Respectfully yours,

Amy and Jim Cahill
20032 Questhaven Rd. B
Escondido, CA 92029
Amy: 760-840-0406
Jim: 760-840-0432

Dear Ms. Ehsan:

First, I want to thank you and your colleagues at Planning and Development Services for all the time and work you've put into reviewing the Valiano project. It really means a great deal to our community and appreciate that you are giving it the due diligence it deserves. My name is Leslie Caskey and I've lived at 2703 El Rocko Road in Harmony Grove since 1986 when I bought my property and built my modest custom home and moved my horses here.

As you know, the project, as proposed, threatens to destroy the wonderful community we are part of and that has existed, undisturbed for over 125 years. It is a unique and special place in San Diego County, the last of its kind west of the 15, I'm afraid. I am taking the opportunity to provide my comments on the Draft EIR for this project in the hopes that the developer will seek to follow the vision of the General Plan and that of the Community.

The following are my major concerns with the project:

- **General Plan Update:** In the 2000s, the County staff and many members of our community (upwards of 60+ over many many meetings) collaborated on the General Plan Update and it was decided that our community should take "our share of density" to accommodate the growth that SD County would experience over the next 20 years. This is where the Community Development Model was implemented where our share of this density would form part of a denser village and then the density would feather outwards away from the village limit line, in order to protect the rural nature and the values of our community. *We agreed with this compromise.* This project violates that compromise and it violates the Community Development Model as it creates higher density outside the village core after the "feathering out" has occurred. This is significant.
- **Harmony Grove Village:** Then came New Urban West proposing a massive development. I was part of the community group that worked with them over several years to come up with a project that fits in with the Community Development Model and our community plan previously elaborated with County Staff. It fulfilled our obligation to accept our fair share of density and growth in San Diego County. We played fair because that is who we are. We are not NIMBYS who reject any and all application. HGV is a clear example of that. AND, it maintained the Community Development model by keeping density in "the village" and feathering out with lower density the further you get away from the village. In fact, the lots to the north of HGV right next to Valiano's proposed area, are large lots (some as big as 10-20 acres), as are virtually every surrounding property to Valiano. The majority of the properties are 1 acre or more. So Valiano violates the word AND the spirit of our community plan and the compromise we made by clustering houses closely together in very high density clusters. To approve this increase in density would be a slap in the face to the community and, frankly, would destroy any trust our community (and many others) have in our County administration.
- **NC17:** This property had already received an up zone from SR2 to SR1. Then they came back in front of the BOS to ask for yet another up zone to SR0.5. This time, the BOS denied them for the reasons mentioned above: it violates the CDM, this community has already accepted its fair share and it violates the spirit of the agreement we made with county during the general plan process. Now, they are trying a third time to get an up zone. Nothing has changed on the ground since it was rejected the last time. The same logic applies and BOS should not approve this up zone for the same reasons as before. I find it very disturbing that a developer can come in and request rezoning and that the residents who have been here for so long have to continue fighting to maintain the rural atmosphere we moved here to experience.
- **Community Plan:** Our community plan calls for a rural community with rural zoning and rural environment. The applicant claims it is a semi-rural development and claim to have rural themes. If houses tightly clustered together, with 1000 foot walls, 20 feet high, manufactured slopes, street lights, fencing and gates and cul-de-sacs can be defined as rural, I think they are

looking at the wrong dictionary. Please, look "rural" up in the dictionary. For me, rural means... [INSERT MORE OF WHAT RURAL MEANS TO YOU PERSONALLY, EG RANCH FENCING, BARNs, OPEN SPACE, WILDLIFE, ANIMAL SMELLS, SOUNDS ETC.] Valiano is none of these things. Not only is this a significant impact but it is an existential impact: our community would be destroyed if Orange County-style developments like Valiano are squeezed into our little bucolic valley.

- **Septic:** Our community plan calls for septic, not sewage treatment plants (again, not rural). The Valiano plan would place a sewage treatment plan directly in front of my property destroying the view of the valley that I love to observe with a glass of wine on my deck in the evening.

Fire Safety Examples:

I am very concerned about the impacts that this project will have on my safety and those of my community. I have evacuated twice and almost had to evacuate two other times since I have been here. During the Cocos fire, we had to battle traffic to finally leave our home – it was frightening to say the least.

- From the DEIR it is clear that they have not taken into account the most recent fire, Cocos Fire. [INSERT PERSONAL ANECDOTE ABOUT THE FIRE]. The DEIR states most fires come from the East, when the last few fires, including Cocos came from the West.
- The 326 houses proposed will make evacuation a very difficult proposition. The DEIR does not show how evacuation will proceed during a wildfire event. The only egress, Country Club Road, will be at LOS F (according to the DEIR) and evacuation on this two lane road will be hazardous and create a fire trap. The people who do not live in the community and who came to gawk at the fire and those of us trying to get our animals to safety caused a huge problem. Adding the additional vehicles from this new development would cause deadlock and is a huge concern. Country Club is only a 2 lane road. It is facing evacuation traffic from 742 houses at HGV, 325 houses at Valiano in addition to the trailers for upwards of 180 horses in Eden Valley as well as the many looky lous who were parked all along the road, semi-blocking it.
- The Fire Protection Plan (FPP) makes no mention of evacuating horse trailers and how that would impact evacuation. Please address this. We have twice as many horses in Eden Valley than we have houses. Trailers are slow, hard to maneuver, big and, importantly very hard to load animals on to. There is only one way out of that valley: Country Club Road towards Autopark way. If the fire comes west, like it did during Cocos there will be a massive traffic jam (LOS F means bumper to bumper traffic in non-evacuation circumstances) that could doom residents to a death trap. This is significant and not mitigated.
- Additionally, they are increasing our risks by asking for (and have already received) a variance on road width on Hill Valley because they don't have easements to widen it. It is not wide enough for two fire trucks to pass side by side. SMFD gives them the variance, but other FD will likely respond (and deal with the safety consequences). **This puts us at more risk as firetrucks will have reduction of access to Hill Valley Road.**
- Lastly, the FPP focuses exclusively on the impacts to *the project* but no reference to how it will jeopardize the wellbeing and safety of existing community.

Traffic Examples:

- [SEE EVACUATION ISSUES ABOVE]

- No analysis was made of the traffic heading West towards Elfin Forest Road. We know, from observation, that the traffic flow is more than 6% as stated in the DEIR. There is also a bottle neck at San Elijo Road.
- The intersection of Country Club and Autopark Way (the main ingress and egress of the project) is already majorly congested. Even now, without HGV built out, we sometimes have to wait two light cycles just to turn left onto Auto Park Way. What's going to happen when all the houses from HGV and Valiano go in? This is an unacceptable, unmitigated impact.
- Furthermore, when the Sprinter comes by every 30 minutes (and soon, it will come every 15 minutes, according to NCT) it becomes even more congested. This impact is significant and unmitigated properly in the plan.
- Citracado Parkway has not been funded yet and there is no indication as to when it might come online. The traffic study doesn't reflect that correctly.
- The sight lines at the intersection of Mt. Whitney and Country Club as well as those at Hill Valley and County Club do not meet county standards.

Equestrian Examples:

The applicant's attempt at incorporating a small number of equestrian lots to somehow check the box on rural and equestrian fails on a number of levels.

- First, there aren't enough equestrian lots. We are an equestrian community and outnumbering equestrian houses with non-equestrian houses will tip the balance against horse-keeping and more towards suburban living.
- Shoe-horning horses and stalls onto 1/3 acre lots along with a two story house and garage makes it less likely that the property will be used for horse-keeping. There is barely enough space for a horse to be kept humanely.
- A horse eats at least 600 pounds of hay a month and produces 500 pounds of manure and soiled bedding every week. On a 1/3 acre lot, there is really no place to pile manure or store hay in a safe manner. Hay, if not kept correctly, can spontaneously combust. It is the cause for many a barn fire.

General Plan Incompatibility:

If the project is allowed to proceed as proposed it will be in direct conflict with at least two of the initiatives contained within the County's Strategic Plan. Specifically:

- *Make neighborhoods healthy places to live, work and play*
 - The noise, air pollution and traffic associated with this project would make my neighborhood a markedly healthier place to live, work and play compared to today
- *Help communities prepare, respond and recover from public health threats, environmental hazards and other emergencies*
 - If this project was built as proposed, the inability to evacuate safely and in a timely manner during a wildfire would leave my community far less able to respond to such an emergency

Visual Character Examples:

The project will be introducing elements that drastically change the aesthetics and visual character of the community in a permanent and significant way:

- Extensive grading, manufactured slopes of up to 60 feet tall;
- 1000 foot walls of up to 20 feet tall, extensive fencing, retaining walls and sound walls,
- not to mention the clustered nature of the development with very high density housing scattered around the project area.
- The DEIR seems to hugely downplay these impacts and show very vague photo simulations (with far away vantage points) which do not show the true nature of these visual and aesthetic impacts.
- Goes against General Plan policy COS 12.1 (does not preserve hillsides and ridgelines, mass grading of natural landforms).

Water

- We are in a major drought and have mandatory water conservation measures being imposed on the current residents.
- It is irresponsible to add more density to this area and cause further hardship to existing residents by having to share water that there is too little of already.
- The HGV project is watering extensively at the moment to establish the new landscaping (even low water use plants need water to get established and putting in landscaping at this time of year requires more water to get plants established). Landscaping should be done in the fall.
- They are also not following the mandates to only water between 8:00pm and 9:00am no more than 2 times/week.

Construction Related Impacts Examples

The construction calls for a large amount of blasting and grading for a period of at least 2 years, and in areas that are in close proximity to houses on hillsides as well as the valley floor. They are also within proximity to livestock and, particularly, horses, which can be very sensitive to noise and vibration. Two years of blasting and grading will be a huge imposition on the local residences and create unsafe situations involving large animals.

- A sound wall will not prevent horses from being spooked by large explosions which can cause a very unsafe situation for horse handlers and riders. It will also destroy the ability for property owners to use their properties in the way they choose (for equestrian purposes, for example).
- The suggested mitigation measure of having livestock moved out of the blasting area every time there will be blasting, is unreasonable and unfeasible. Remember, there are over 180 horses in Eden Valley alone. Moving large animals is a complicated and potentially dangerous job. Doing so on a large scale would be very impractical. Several properties adjacent to the project site have 20 to 120 horses onsite at any given time.
- I have elderly horses who are much more susceptible to illness or injury due to moving from familiar environs. They lost a huge amount of weight when we evacuated last year and it took months to restore them to health. It is not reasonable to suggest moving them so an out of town developer can make money.

In summary, I feel that we have acted in good faith working with the developers but they have not done so in return. The initial plans for the HGV project that we worked on and approved are nothing like the final project which is just another high density housing development with a half-hearted attempt to appease residents by putting in what they call "multi-use" trails. There is insufficient room for two horses going in opposite directions to pass safely and put in moms with strollers and bicycles and someone is going to get hurt – it is only a matter of time.

Thank you for considering these issues. I urge you to do the right thing for the current residents of Harmony Grove and Eden Valley.

Sincerely,

Leslie J. Caskey
2703 El Rocko Road
Escondido, CA 92029
760-745-2689

Ehsan, Beth

From: mickeykc@juno.com
Sent: Monday, June 15, 2015 1:24 PM
To: Ehsan, Beth
Subject: Valiano EIR comments PDS2013-13-001

Dear Ms. Ehsan,

I want to thank you (all of the County representatives) for coming out to Elfin Forest to present the information on the above mentioned project last month.

I am a 32 year resident of Elfin Forest. I am a native San Diegan...born and raised in Pacific Beach. My husband and I moved to Elfin Forest in 1983 because of the quiet rural environment. We loved the large residential lots, the dark skies (no street lighting), no sidewalks, the quiet (we can still hear the trains on the tracks that run along the coast at certain times of the day...and we are a bit of a distance from the coast), the septic systems vs sewage plants. I was on the San Dieguito Planning group for about 4 years around 1988 and beyond. I helped write the info for Elfin Forest for the community plan update at that time. So I have had some experience with EIRs and certainly the community plan and the community character of Elfin Forest.

Unfortunately, as you know, once one project comes in, other similar projects seem to follow (one project begets the next). The first project that "infested" our area was San Elijo. There was not much that the County could do with this project since it was in the boundaries of the City of San Marcos. But it was certainly not in keeping with the community character of Elfin Forest. Whereas we are rural, San Elijo was very urban. From what I remember, San Elijo said that their development would have no traffic impact on us. I remember that when the county was talking about putting in, what is now, San Elijo Rd, they said that Sandag said it would have to be put in to keep Rancho Santa Fe Rd from going to level of service "F" at peak traffic hours. I don't know if anyone has done a comparative study to check the traffic levels on Elfin Forest Rd before San Elijo as compared to what it is now. The new development in Harmony Grove, Harmony Grove Village, also said there would be no impact along Elfin Forest Rd. That is also a ridiculous statement. We all know traffic will flow the way of least resistance. I believe that Hwy 78 and I-15, at peak hours are close to, if not at, LOS F. Why would anyone wanting to get from either east to west or west to east along gridlocked roadways when they could simply go down Elfin Forest Rd, which is not gridlocked....yet.

As for comments for the Valiano EIR, I offer the following remarks:

As far as development goes, all developments should follow the community plan for the area. This development is not in harmony with the community plan, that was approved by the county. Lots should be large, as are most of the surrounding lots. Clustered developments, such as this one and Harmony Grove Village, bring an urban flavor, to what is supposed to be rural, to the area, which destroys the community character of the area. Harmony Grove Village should not have been approved, but this development should not be approved simply because Harmony Grove Village was approved (again, one project typically begets the next). Two wrongs don't make a right. There are many horses in the area, and with the commercial area proposed in this new project, along with the additional homes added to the already approximately 800 approved homes, will make it difficult for people to ride their horses safely.

This project will cumulatively add more traffic onto the road and impact people to the east and west of the project and will impact those of us to the west in Elfin Forest. We are currently on a two lane, light collector road. There are no sidewalks, no bike lanes, and the roads may not even be to code for width. We have seen multiple accidents (some fatal) occur along Elfin Forest and Harmony Grove roads due to people using the roads as a short cut, passing on blind curves (our road have double yellow lines where no passing is allowed). Many bike riders use Elfin Forest and Harmony Grove Roads to travel on. There are no bike lanes, and with the new law, drivers must stay a certain distance from them, which causes the car drivers to cross over the double yellow lines to get by them, around these blind curves. Many parts of the roadway along Elfin Forest and Harmony Grove Road have streets and driveways exit onto them. Many of these areas have poor site distance, especially given that most of Harmony Grove Road is 45 mph, and 50 mph along Elfin Forest Road. The added traffic will cause more problems. The lack of a comment about any traffic from this development westward along Harmony Grove Rd and Elfin Forest Rd from this development, or to say that the traffic would be at a level of insignificance is inaccurate. Once again, all that needs to be done is to study the effects of San Elijo development on our roadways to see that there will be an impact. The cumulative impact of San Elijo, or other developments to the west, and including Harmony Grove Village, Valiano, and another proposed project (to the south of Harmony Grove Rd bordering the Elfin Forest Reserve....potentially 300 homes) should ALL be taken into consideration when doing a traffic study for potential impacts to the current RURAL communities in the area.

Besides the known impacts, destruction of community character should also be an important consideration when looking at an EIR.

I have lived, as I said, out in the Elfin Forest area for over 32 years.

I have evacuated 5 times due to fires in our area. I noticed last year that the evacuation was very dangerous due to the urban development in San Elijo. The Sheriffs dept (I think) blocked off Elfin Forest Rd and we were not initially allowed to evacuate in that direction, effectively putting us in a dangerous situation, not allowing us to leave, as fire was coming our way. Even if the roads had been open, it would not have helped because the evacuation route was gridlocked, LOS F, due to the volumes of cars fleeing the San Elijo development. Had the fire moved faster, or had we had a fast wind, there could have been many lives lost.

With the development of the Harmony Grove Village and now possibly the Valiano project, the EIR does not adequately address the large amount of homes, and the traffic that comes with it, and how people will be evacuated. It was not adequately addressed in the EIR with Harmony Gove Village either. We, in Elfin Forest, have two ways in and out: we can go to the east along Harmony Grove Rd, or to the west along Elfin Forest Rd to San Elijo. With these developments off Harmony Grove (including the future development by the EF Reserve), it will increase the danger to the homeowners because of the inability to flee the area in a disaster.

In addition, due to the fact that there are so many horse owners in Elfin Forest and Harmony Grove, there could be a substantial loss of animal life, given that many of the horse trailers may not be able to get out. I believe that the county would be liable for any loss of life, should this, or any other, developments be approved, given the known problems with traffic and poor evacuation routes due to increased traffic due to these developments.

I do not have a problem with a property owner developing their property as the surrounding properties, but I do have a problem with density increases. A property owner knows what they can build on a parcel when they buy it. They do not have a right to develop it at a higher density.

Our area, as said before, is supposed to be rural, on septic systems (to keep density low). We moved out here for the dark skies (therefore no light pollution with street lighting), the quiet, the horse trails, and the dirt paths. The county has the responsibility to allow development in our area that is the same as the current, rural development, as per our community plan. The county has the responsibility to keep our community safe on our roads, and safe in an evacuation. I see nothing in this development that adds anything positive to our rural community. I ask that the county scale back this development and make sure it stays in harmony with our current community: large lots (2 acres), septic tanks (no sewer), no street lighting, etc.

Thank you.

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Ehsan, Beth

From: Paul A.Curtis <paultrout@aquasolver.com>
Sent: Thursday, June 11, 2015 8:48 AM
To: Sibbet, David; Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark; Fitzpatrick, Lisa; Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill; bruce.bettyliska@gmail.com; douglas.dill@att.net
Cc: EFHGTC
Subject: Valiano Draft Environmental Impact Review Paul Curtis, Elfin Forrest Resident
Attachments: Valiano EIR Biological Review Paul Curtis 6 2015.pdf

Please find a response attached for the

- Valiano Draft Environmental Impact Report: PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2014-MUP-14-019, PDS2013-STP-13-003, PDS2013-ER-13-08-002

As a community we are very worried about this development. It does not conform to the long developed GP2020 general plan. If it is successful it will destroy sensitive habitats and have a negative impact on several threatened and listed species. It will also set a precedence for other developers and essentially null the General Plan GP2020. I truly hope the voices of the community can bring some common sense to development in our neighborhoods which was supposedly addressed with the General Plan.

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A Review of the Biological Findings from the Draft EIR Study for the Proposed Valiano Development in Eden Valley California.

Dear Sir/Madam

June 8, 2015

Below are my comments to the draft EIR for the Valiano Draft Environmental Impact Report: PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2014-MUP-14-019, PDS2013-STP-13-003, PDS2013-ER-13-08-002.

As an ecologist it is always difficult reading documents such as this where the developer spends a great deal of time outlining all of the damage their project is going to do and then dismissing it through mitigation or other assumptions. Many assumptions are made using very small sample size investigations which are not indicative of true wildlife activity. After review of the document I have many points to bring forth questioning the validity of the assumptions and mitigation.

1) Section 2.4.2.1 Special Species status

The developer states there are no listed species in the project area. This is inaccurate as the Least Bells Vireo, the Coastal California Gnatcatcher and horned lizard are listed species and are present in the Elfin Forrest, Harmony Grove and Eden Valley areas. The destruction of any habitat for these listed species is unacceptable. I believe this is a huge oversight or omission in this study.

Mitigation of any habitat destruction from an ecological standpoint is unacceptable as there is still a net loss of habitat and thus a net loss of required resources and ultimately a reduction in the number of individuals that can be supported. When dealing with listed species we must be thinking in an alternate direction as with habitat restoration and conservation, not destruction. In fact there is some riparian areas that are being rehabilitated to Southern Willow Scrub (SWS) on the Harmony Village project adjacent to the proposed Valiano site. The SWS is the preferred habitat for the Least Bells Vireo and it is most likely these bird do or will exist here. The Valiant project has indicated a 0.04 acre loss of SWS and would most likely have an impact on this listed species. Why is this not brought to attention in this EIR. It is very disappointing that an omission like this is made and makes one suspicious about the rest of the document and the validity of the studies.

The Coastal California Gnatcatcher and the Horned Lizard are similarly missing from the study and as with the Vireo, their habitat loss will have similar impacts. Again any loss of habitat for a listed species is unacceptable.

I have been working with local groups and agencies on trying to rebuild the listed Southern Steelhead in Southern California. As the Escondido Creek drains into the ocean it is considered an anadromous stream and a possible habitat for steelhead. With this, there are strict regulations as to what can happen in on and around the stream. Even though there are no known steelhead, the habitat is conserved. The same should hold for terrestrial habitat for listed

species. The EIR has ignored this and appears to have either accidentally or purposely committed these two species from the study.

There is so much conservation activity going on in these neighborhoods and it seems counter productive with the destruction of more sensitive habitat. We have compromised with development in our communities and do not want to compromise for any more extended habitat destruction.

Burrowing Owls 2.4-22

Again the study assumes that as there was no burrowing owls utilizing the habitat resources that they never will and that there is no impact. As I have already stated the habitat that exists that is suitable for a species, the assumption needs to be that they will return given the opportunity in conjunction with other conservation activities. If we keep eliminating crucial habitat the species will cease to exist. The EIR does not seem to address the amount of suitable habitat that exists locally and in the range of the species being considered. I think this would be a valuable component when looking at species and habitat loss. I still find it hard to believe that the loss of any sensitive habitat is potentially allowed.

Indirect Impacts/ Edge Effects 2.4-21 2.4-22

As the EIR has not done a good job at addressing the real impacts of the project on listed species as well as other species, their determination on edge effects is inaccurate. All of the species that are outlined and those listed species that were ignored are going to be impacted. The long term edge effect will have an impact. How can it not? Any alteration of the surrounding environment will affect the local resources. It is well known that the diversity and types of species will change due to edge effects. There will most definitely be an impact on the cross section of species inhabiting the surrounding resources. These impacts are from noise, dogs and cats, human intrusion, dumping, domestic chemical use, drainage from homes etc. etc etc.....

Fragmentation is also an issue that has not been addressed. The EIR presents some habitats that are considered salvaged yet they are completely surrounded by development. Soule (1991) provided evidence at how fragmentation will destroy the habitat over time due to the isolation. The smaller the habitat that is fragmented, the extinction rate is increased. These fragmented areas will need to be considered as destroyed and evaluated as such. As these were considered sensitive they will need to be conserved for the benefit of the species impacted and the development altered to conform to the General Plan to allow its conservation. Again the omission of the listed species that will potentially re-inhabit the sensitive habitats of Elfin Forest, Harmony Grove and Eden Valley seems to have been used to make the impact seem less serious. I feel the the ecological impact to the other sensitive species has been understated as any loss of habitat equates to a loss of resources and a diminishment of the population. See the section on mitigation.

The loss of sage is of huge concern. As of 1991 the USFWS reported that 70% to 90% of the sage scrub is gone and we can not afford to lose more. This habitat loss is critical and is a main contributor to the decline of species dependent on this resource.

Wildlife Access 2.4-27

How is the study sure that the habitat is not supporting foraging, breeding etc? Any habitat provides resources and will contribute to the success of a species or population. The study sample sizes are very small and making conclusions such as this is impossible. There was already a statement saying that there is foraging by raptors. These would surely be impacted. How is this no significant affect.

GP2020, What Happened?

As a resident of Elfin Forrest and a biologist/ecologist i have reviewed many EIR's and spent a great deal of time involved in the development of the General Plan 2020. We believed that this was going to give the residents of Elfin Forrest, Harmony Grove and Eden Valley some security in how development would proceed. There was a great deal of sacrifice and compromise made by the residents of these communities in order to come to an agreement. Over 10 years was spent on this process and now we are asking why did we do this? Even before the ink has dried on the document we are now faced with developers trying to get the rules changed to facilitate their grossly nonconforming projects and destruction of crucial habitat.

I feel betrayed in the fact that after we thought we had some security in out communities, we are right back where we started. Why did we waste all that time (10 plus years) and money on the General Plan when groups with money can come in a try to dictate the rules? This and other non-conforming projects should just be told NO. I, and I am sure many in the community, believe this is how it should be. Adherence to the GP would save a lot of money and community stress.

On page 2.4-35 there is a statement that there is "NO IMPACT WOULD OCCUR ASSOCIATED WITH LOCAL POLICIES< ORDINANCES AND ADOPTED PLANS". This is an outright lie as the entire project does not conform to the GP20202 general plan and this entire document is an attempt to change the general plan for their project.

I am just commenting on the biological portion and has found many errors, and inconsistencies. It is very disconcerting that this biological portion is even being considered as accurate. These errors and omissions should have been identified by other reviewers and particularly the consultants doing the work. I think this again highlights the need for third party reporting and not having a company hired by the developer to do the analysis and studies. The bias and omissions written into this portion of the report is offensive as this whole project is. The complete disregard of the general plan and all of us that live in this community that have helped develop the general plan and are living by it, including the undesirable portions which we compromised on like Harmony Grove Village. We are done with more compromise.

The Use of Mitigation to Justify Habitat Destruction

Ecologically the use of mitigation for to "offset" the loss of habitat during development debilitating to species. The ability of a species to exist is solely based on the availability of resources. These resources are composed of everything from food and water to availability of

other reproductive individuals. All of these resources are available within the habitat available. As we continue to destroy more habitat, the level of resources declines, few individuals can exist and we push species closer to being endangered. Of course some species are much more adaptable and can cope but others are not and thus decline more rapidly in population. We have two examples here with the Least Bell's Vireo and the Coastal California Gnatcatcher. They have been driven to endangered status by urban sprawl and habitat loss. The Elfin Forrest, Harmony Grove and Eden Valley areas are a few of the last vestiges of appropriate habitat for these animals and we cannot afford to lose more. In fact, more restoration projects are needed to try and help provide more resources and thus increase resident populations.

The misnomer of Mitigation is that something is being conserved when in actual fact there is a loss. The mitigation of small plot here and small plot there causes fragmentation and Soule (1991) demonstrated how detrimental that is to the survival of a species. We need to reevaluate the use of mitigation and the negative impacts it has on species. With this, the following paragraph is inaccurate. The use of mitigation has not worked and needs reevaluation. Why is the assumption that existing habitat is slated for destruction and only through the destruction of some habitat is other habitat conserved? This is not conserving species or ensuring that they "thrive". These are sensitive species and have become threatened or listed because of habitat destruction and the destruction of more habitat will equate a loss of individuals and a reduction of the population. The loss of habitat not only affects the absolute number of individuals it also decreases the potential diversity of the species. With loss of specific areas and territories there will be less intermingling of individuals between territories or somewhat isolated areas of habitat and/or territories. It is this intermingling of different populations of the same species that maintain or expand genetic diversity. When eliminating any of these areas or territories we are reducing the ability to maintain or are diminishing diversity. From an ecological standpoint, this does not equate to a thriving population or allowing a population to thrive.

"The specified habitat mitigation ratios take into consideration the importance of preserving areas necessary to ensure the continued survival of the more sensitive raptors and the grasshopper sparrow. The habitat preservation ratio is effective because through retention of sustainable habitat, sensitive species can continue to thrive. The mitigation would preserve species habitat and foraging grounds, and thus, help ensure survival of these species within the Project site (open space) and within the County. The mitigation ratios utilized for impacts to these species' habitats were developed based upon NCCP Guidelines (CDFW and California Resources Agency 1997) intended to accomplish preservation of sensitive species, and the wildlife agencies have reviewed and approved these mitigation ratios."

Throughout this section the authors are stressing how little impact there will be and all is glowing. How can this be when there are 17 significant biological impacts! Harmony Grove, Elfin Forest and Eden Valley have some of the last vestiges of the habitats being destroyed west of Interstate 15. With this these areas have been valued for mitigation from other developments. We should be conserving what we have and not fragmenting and destroying some of these essential and/or critical habitats.

Ignoring MSCP?

Why is the MSCP being ignored and the standards from older requirements. Although the original MSCP was developed for south San Diego county, there are new guidelines being established for North County and should be implemented for this document

From the MSCP document "The overall MSCP goal is to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, thereby preventing local extirpation and ultimate extinction. This is intended to minimize the need for future listings, while enabling economic growth in the region. Where land is preserved as part of the MSCP Preserve through acquisition, regulation, mitigation or other means, management is necessary to ensure that the biological values are maintained over time and remain viable."

This study is very weak and is obviously prepared by a company that was paid by the developer. It would be far more appropriate for the developer to provide funds to an independent group or the county to then hire the companies to do the studies. This EIR reads like a pretty picture of how this is such a wonderful project and is going to have such little effect on the local environment. In reality there will be significant impact on several endangered and listed species not to mention the lives of other wildlife species and those of us living in these communities.

I chose to focus on biological aspects but there are also many concerns with traffic and fire safety which I know are being commented on in more detail by others in the community. With the road infrastructure now in place for Harmony Grove Village which appears inadequate to carry the density being built and then add another development the area is going to be overrun. It is a fire evacuation hazard as well as a daily hazard for residents of the existing communities. The impacts on Harmony Grove road and Elfin Forrest Road were not even addressed. These roads are considered scenic drives and are to remain 2 lane. The developers projects will do nothing but make them more hazardous than they are now.

We as community members worked very diligently on identify areas where we would compromise in the development of the GP2020 general plan in order to attain some security for our communities against the types of development proposed by Valiano. Here we are after all the work and oney spent with the ink barelly dry on the General Plan and we are again fighting for our rural way of life. This is unfair to us and any developer whose plan does not comply to the General Plan should just be told NO!

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Ehsan, Beth

From: Jan Denny <jan@raptorridge.net>
Sent: Sunday, June 14, 2015 2:34 PM
To: Sibbet, David; Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark
Cc: Fitzpatrick, Lisa; Cox, Greg; Jacob, Dianne; Roberts, Dave; Horn, Bill; bruce.bettyliska@gmail.com; douglas.dill@att.net; fhgtc@gmail.com
Subject: Resident Input on the Valiano Project in Harmony Grove

Dear Ms. Ehsan:

First, I want to thank you and your colleagues at Planning and Development Services for all the time and work you've put into reviewing the Valiano project. It really means a great deal to our community and appreciate that you are giving it the due diligence it deserves. My name is Jan Denny and I've lived on Seaquest Trail in Elfin Forest for 14 years.

As you know, the project, as proposed, threatens to destroy the wonderful community we are part of and that has existed, undisturbed for over 125 years. It is a unique and special place in San Diego County, the last of its kind west of the 15, I'm afraid. I am taking the opportunity to provide my comments on the Draft EIR for this project in the hopes that the developer will seek to follow the vision of the General Plan and that of the Community.

The following are my major concerns with the project:

Community and Land Use Example

- **General Plan Update:** In the 2000s, the County staff and many members of our community (upwards of 60+ over many many meetings) collaborated on the General Plan Update and it was decided that our community should take "our share of density" to accommodate the growth that SD County would experience over the next 20 years. This is where the Community Development Model was implemented where our share of this density would form part of a denser village and then the density would feather outwards away from the village limit line, in order to protect the rural nature and the values of our community. I was on the Elfin Forest / Harmony Grove Town Council at that time, and personally participated in this difficult process. *We agreed with this compromise.* This project violates that compromise and it violates the Community Development Model as it creates higher density outside the village core after the "feathering out" has occurred. This is significant.
- **Harmony Grove Village:** Then came New Urban West proposing a massive development. We worked with them over several years to come up with a project that fits in with the Community Development Model and our community plan previously elaborated with County Staff. It fulfilled our obligation to accept our fair share of density and growth in San Diego County. We played fair because that is who we are. We are not NIMBYS who reject any and all application. HGV is a clear example of that. AND, it maintained the Community Development model by keeping density in "the village" and feathering out with lower density the further you get away from the village. In fact, the lots to the north of HGV right next to Valiano's proposed area, are large lots (some as big as 10-20 acres), as are virtually every surrounding property to Valiano. The majority of the properties are 1 acre or more. So Valiano violates the word AND the spirit of our community plan and the compromise we made by clustering houses closely together in very high density clusters. To approve this increase in density would be a slap in the face to the community and, frankly, would destroy any trust our community (and many others) have in our County administration.
- **NC17:** This property had already received an up zone from SR2 to SR1. Then they came back in front of the BOS to ask for yet another up zone to SR0.5. This time, the BOS denied them for the reasons mentioned above: it violates the CDM, this community has already accepted its fair share and it violates the spirit of the agreement

we made with county during the general plan process. Now, they are trying a third time to get an up zone. Nothing has changed on the ground since it was rejected the last time. The same logic applies and BOS should not approve this up zone for the same reasons as before.

- **Community Plan:** Our community plan calls for a rural community with rural zoning and rural environment. The applicant claims it is a semi-rural development and claim to have rural themes. If houses tightly clustered together, with 1000 foot walls, 20 feet high, manufactured slopes, street lights, fencing and gates and cul-de-sacs can be defined as rural, I think they are looking at the wrong dictionary. Please, look “rural” up in the dictionary. Valiano is none of these things. Not only is this a significant impact but it is an existential impact: our community would be destroyed if Orange County-style developments like Valiano are squeezed into our little bucolic valley.
- **Septic:** Our community plan calls for septic, not sewage treatment plants (again, not rural). This is inconsistent.

Fire Safety Examples:

I am very concerned about the impacts that this project will have on my safety and those of my community.

- From the DEIR it is clear that they have not taken into account the most recent fire, Cocos Fire. The DEIR states most fires come from the East, when the last few fires, including Coco’s came from the West. I could see the Cocos fire from my house in western Elfin Forest, and of course had to evacuate with my family, animals, and a few belongings.
- The 326 houses proposed will make evacuation a very difficult proposition. The DEIR does not show how evacuation will proceed during a wildfire event. The only egress, Country Club Road, will be at LOS F (according to the DEIR) and evacuation on this two lane road will be hazardous and create a fire trap. On the other end of the valley, San Elijo Road (which is a 4 lane road emptying into a 6 lane road) had people sitting in their cars for over an hour as flames were visible overhead on Double Peak. Had the fire not changed direction towards Harmony Grove as they did, you would have had a tragedy on your hands. Country Club is only a 2 lane road with LOS F. It is facing evacuation traffic from 742 houses at HGV, 325 houses at Valiano in addition to the trailers for upwards of 180 horses in Eden Valley.
- The Fire Protection Plan (FPP) makes no mention of evacuating horse trailers and how that would impact evacuation. Please address this. We have twice as many horses in Eden Valley than we have houses. Trailers are slow, hard to maneuver, big and, importantly very hard to load animals on to. There is only one way out of that valley: Country Club Road towards Autopark way. In the Harmony Grove Fire, many people were unable to get their horses into a trailer, so walked them out – down the middle of the street. If the fire comes west, like it did during Cocos there will be a massive traffic jam (LOS F means bumper to bumper traffic in non-evacuation circumstances) that could doom residents to a death trap. Can you imagine this chaotic scene? People walking, cars in the road, horses in the road, everyone in a state of panic – and multiple this by the number of homes and animals. This is significant and not mitigated.
- The response times from San Marcos Fire District would be 7.5 minutes (above the 5 minutes standard). The DEIR assumes mutual aid from a fire station that hasn’t been funded (at HGV) so that fire station cannot be used in the analysis. They are offering to pay into that fire station, but not Escondido Fire which will likely be the first responder. This is significant.
- Additionally, they are increasing our risks by asking for (and have already received) a variance on road width on Hill Valley because they don’t have easements to widen it. It is not wide enough for two fire trucks to pass side by side. SMFD gives them the variance, but other FD will likely respond (and deal with the safety consequences). **This puts us at more risk as firetrucks will have reduction of access to Hill Valley Road.**

- They are assuming existing home owners will be responsible for Fuel Modification Zones, an encumbrance to those landowners.
- Lastly, the FPP focuses exclusively on the impacts to *the project* but no reference to how it will jeopardize the wellbeing and safety of existing community.

Traffic Examples:

- No analysis was made of the traffic heading West towards Elfin Forest Road. We know, from observation, that the traffic flow is more than 6% as stated in the DEIR. There is also a bottle neck at San Elijo Road.
- The intersection of Country Club and Autopark Way (the main ingress and egress of the project) is already majorly congested. Even now, without HGV built out, we sometimes have to wait two light cycles just to turn left onto Auto Park Way. What's going to happen when all the houses from HGV and Valiano go in? This is an unacceptable, unmitigated impact.
- Furthermore, when the Sprinter comes by every 30 minutes (and soon, it will come every 15 minutes, according to NCT) it becomes even more congested. This impact is significant and unmitigated properly in the plan.
- Citracado Parkway has not been funded yet and there is no indication as to when it might come online. The traffic study doesn't reflect that correctly.
- The sight lines at the intersection of Mt. Whitney and Country Club as well as those at Hill Valley and County Club do not meet county standards.

Equestrian Examples:

The applicant's attempt at incorporating a small number of equestrian lots to somehow check the box on rural and equestrian fails on a number of levels.

- First, there aren't enough equestrian lots. We are an equestrian community and outnumbering equestrian houses with non-equestrian houses will tip the balance against horse-keeping and more towards suburban living.
- Shoe-horning horses and stalls onto 1/3 acre lots along with a two story house and garage makes it less likely that the property will be used for horse-keeping. There is barely enough space for a horse to be kept humanely.
- A horse eats at least 600 pounds of hay a month and produces 500 pounds of manure and soiled bedding every week. On a 1/3 acre lot, there is really no place to pile manure or store hay in a safe manner. Hay, if not kept correctly, can spontaneously combust. It is the cause for many a barn fire.

General Plan Incompatibility:

If the project is allowed to proceed as proposed it will be in direct conflict with at least two of the initiatives contained within the County's Strategic Plan. Specifically:

- *Make neighborhoods healthy places to live, work and play*
 - The noise, air pollution and traffic associated with this project would make my neighborhood a markedly healthier place to live, work and play compared to today
- *Help communities prepare, respond and recover from public health threats, environmental hazards and other emergencies*
 - If this project was built as proposed, the inability to evacuate safely and in a timely manner during a wildfire would leave my community far less able to respond to such an emergency

Visual Character Examples:

The project will be introducing elements that drastically change the aesthetics and visual character of the community in a permanent and significant way:

- Extensive grading, manufactured slopes of up to 60 feet tall;
- 1000 foot walls of up to 20 feet tall, extensive fencing, retaining walls and sound walls,
- not to mention the clustered nature of the development with very high density housing scattered around the project area.
- The DEIR seems to hugely downplay these impacts and show very vague photo simulations (with far away vantage points) which do not show the true nature of these visual and aesthetic impacts.
- Goes against General Plan policy COS 12.1 (does not preserve hillsides and ridgelines, mass grading of natural landforms).

Air Quality and Green House Gases Examples:

According to the DEIR, the project will have significant and unavoidable air quality impacts and no way to mitigate these impacts.

- More than doubles the vehicle miles traveled (VMTs).
- They don't show that a project with fewer units is infeasible.
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- A sound wall will not prevent horses from being spooked by large explosions which can cause a very unsafe situation for horse handlers and riders. It will also destroy the ability for property owners to use their properties in the way they choose (for equestrian purposes, for example).
- The suggested mitigation measure of having livestock moved out of the blasting area every time there will be blasting, is unreasonable and infeasible. Remember, there are over 180 horses in Eden Valley alone. Moving large animals is a complicated and potentially dangerous job. Doing so on a large scale would be very impractical. Several properties adjacent to the project site have 20 to 120 horses onsite at any given time.

Please take these concerns seriously when reviewing Valiano's proposal. They reflect the very real fears of the people who will be living with this development for many, many years to come.

Thank you for your time.

Jan Denny
2255 Seaquest Trail

Elfin Forest, CA 92029
760-420-7324

Ehsan, Beth

From: Susanne Desai <susannedesai@gmail.com>
Sent: Monday, June 15, 2015 1:37 PM
To: Wardlaw, Mark; Blackson, Kristin; Loy, Maggie A; Ehsan, Beth; Sibbet, David
Cc: efhgtc@gmail.com; douglas.dill@att.net; bruce.bettyliska@gmail.com; Horn, Bill; Ron-Roberts; Roberts, Dave; Jacob, Dianne; Cox, Greg
Subject: Comments on Draft DEIR Valiano/ Elfin Forest

Dear County Planning and Development Services, Thank you for your time and service to the well being of our county of San Diego.

I live at 7030 Elfin Oaks Road 92029 in the unincorporated area of San Diego. For the last 8 years I have enjoyed the peaceful rural atmosphere of Elfin Forest on my 4.6 acres. My property borders elfin forest road and we have seen a huge increase in traffic on the road which affects the private trail and my horse arena adjacent to the traffic. I am a professional horse writer and I have 30 years experience keeping horses. I can hear the traffic loudly from my windows. I have many concerns with the county approving any plans which would directly affect my quality of life in a rural area and my property values. The draft EIR for Valiano has many concerns for me.

1. Safety. I am concerned about fire safety. Last May it was hard to evacuate my 2 horses due to traffic. I was turned around with trailer my police and had to drive past fire to evacuate because the traffic on San Elijo Road was not moving. I am concerned that if I have a heart attack there will not be service and our island of service will be even more unreachable in good time.
2. I am very concerned about the traffic on Elfin Forest Road as it is already too loud to be around on my 4.6 acres with my 2 horses. There are many trucks over weight limit and just the amount of traffic in the morning and at night make it unsafe for me to ride in the arena as it is now and with many more houses that will be much worse.
3. My house is only as nice as the community it is based in. I am afraid these new houses if they are approved will destroy the nature on my 4.6 acres and the rural character of elfin forest community. I also have a protected oak tree reserve on my property which I cannot build on and plan to protect for many years to come. I have over 25 protected native oak trees on my reserve.

Thank you for taking my comments into consideration.

Susanne Desai
7030 Elfin Oaks Rd
Elfin Forest, CA 92029
858-354-6044

Ehsan, Beth

From: Jan Duncan <janduncan77@yahoo.com>
Sent: Monday, June 15, 2015 1:07 PM
To: Ehsan, Beth
Cc: Horn, Bill; diannejocab@sdcounty.ca.gov; Cox, Greg; ron.roberts@sdcounty.ca.com; Roberts, Dave; bruce.bettyliska@gmail.com
Subject: Fw: EV Bugle - DEIR Comments Due Monday 6/15.

The following is a letter that I can not edit or would do so. I would like to add some comments of my own while I whole heartedly agree with all of the above concerns voiced by other residents in Eden Valley

I live on Eden Valley Rd. I moved here from the coast to escape the traffic, noise and general attitude of mass housing density was well as quiet roads. I and many(most) residents have horses that we enjoy keeping at home but haul out to many areas for competition, trail riding etc. It is my understanding that Eden Valley is a private road the residents payed to have paved. It is already dangerous to pull out with a horse trailer at certain times of the day and may become impossible if it used as an access road for the Valiano project. There is a larger canal that crossed the road which is presently a deep culvert area that you have to drive thru. There are barns and dwellings located closely to the road at it's present size. There is only a small area of the proposed Valiano project that even accesses Eden Valley Lane. Maybe 100 feet while there are other roads that abut much more of the proposed project land.

Additionally there is no way evacuating for a fire down Eden Valley could be accomplished with more homes as it was rough during the fire last year that came into the neighbor. Fire fighting agencies were so overburdened and lacked the resources to adequately defend our area. It was a neighbor with large equipment that went in and cut the fire breaks and actually assisted fighting the fire while a handful of Cal fire people looked, unlocking gates and cutting fences to let him in.

I cannot not find a way that Integral / Valiano can mitigate the traffic, fire, and let's not forget WATER concerns as well as the effect the overconstruction and building on our beloved horses and other livestock in the valley let alone the natural animal residents.

When I moved into the neighborhood I carefully checked what it was zoned for, what was allowed etc. Why aren't the developers held accountable for the same.

The whole area is already not prepared for the Harmony Grove Village starting up now. Their designated "horse trails" are a joke when it comes to the safety of all using them.

Jan Duncan

On Sunday, June 14, 2015 6:50 PM, Friends Of Eden Valley <edenvalleynews@aol.com> wrote:

Hi all:

For those who still haven't submitted comments for the Valiano Draft EIR, the deadline is **this Monday, June 15 at 4pm**. We really need as many people as possible to submit comments, however brief. Many thanks to all those who have submitted so far.

If you're at a loss for exactly what to say in your comments, we've created some examples (see below) that you might want to use to submit comments across a variety of categories. There should be an intro that explains who you are and why you are writing. And then there are numerous categories of issues you can choose from. I would pick 2 or 3 issues (or more, if you choose) you find most relevant to you and personalize them (paraphrase or whatever). The key is to incorporate anecdotes from your own personal experiences (such as traffic, the fires, community character, rural nature of where we live, etc.) that are personal and relevant to the DEIR.

Intro Example

Dear Ms. Ehsan:

First, I want to thank you and your colleagues at Planning and Development Services for all the time and work you've put into reviewing the Valiano project. It really means a great deal to our community and appreciate that you are giving it the due diligence it deserves. My name is _____ and I've lived on _____ in [INSERT COMMUNITY] for _____ years.

As you know, the project, as proposed, threatens to destroy the wonderful community we are part of and that has existed, undisturbed for over 125 years. It is a unique and special place in San Diego County, the last of its kind west of the 15, I'm afraid. I am taking the opportunity to provide my comments on the Draft EIR for this project in the hopes that the developer will seek to follow the vision of the General Plan and that of the Community.

The following are JP's major concerns with the project:

[FOLKS: pick one, two or three of the below major areas of impact that you are most concerned with and then include a personal anecdote that personalizes it. Feel free to paraphrase the text provided (it would be good if you did).]

Community and Land Use Example

- **General Plan Update:** In the 2000s, the County staff and many members of our community (upwards of 60+ over many many meetings) collaborated on the General Plan Update and it was decided that our community should take "our share of density" to accommodate the growth that SD County would experience over the next 20 years. This is where the Community Development Model was implemented where our share of this density would form part of a denser village and then the density would feather outwards away from the village limit line, in order to protect the rural nature and the values of our community. *We agreed with this compromise.* This project violates that compromise and it violates the Community Development Model as it creates higher density outside the village core after the "feathering out" has occurred. This is significant.
- **Harmony Grove Village:** Then came New Urban West proposing a massive development. We worked with them over several years to come up with a project that fits in

with the Community Development Model and our community plan previously elaborated with County Staff. It fulfilled our obligation to accept our fair share of density and growth in San Diego County. We played fair because that is who we are. We are not NIMBYS who reject any and all application. HGV is a clear example of that. AND, it maintained the Community Development model by keeping density in “the village” and feathering out with lower density the further you get away from the village. In fact, the lots to the north of HGV right next to Valiano’s proposed area, are large lots (some as big as 10-20 acres), as are virtually every surrounding property to Valiano. The majority of the properties are 1 acre or more. So Valiano violates the word AND the spirit of our community plan and the compromise we made by clustering houses closely together in very high density clusters. To approve this increase in density would be a slap in the face to the community and, frankly, would destroy any trust our community (and many others) have in our County administration.

- **NC17:** This property had already received an up zone from SR2 to SR1. Then they came back in front of the BOS to ask for yet another up zone to SR0.5. This time, the BOS denied them for the reasons mentioned above: it violates the CDM, this community has already accepted its fair share and it violates the spirit of the agreement we made with county during the general plan process. Now, they are trying a third time to get an up zone. Nothing has changed on the ground since it was rejected the last time. The same logic applies and BOS should not approve this up zone for the same reasons as before.
- **Community Plan:** Our community plan calls for a rural community with rural zoning and rural environment. The applicant claims it is a semi-rural development and claim to have rural themes. If houses tightly clustered together, with 1000 foot walls, 20 feet high, manufactured slopes, street lights, fencing and gates and cul-de-sacs can be defined as rural, I think they are looking at the wrong dictionary. Please, look “rural” up in the dictionary. Valiano is not it. For me, rural means... [INSERT MORE OF WHAT RURAL MEANS TO YOU PERSONALLY, EG RANCH FENCING, BARN, OPEN SPACE, WILDLIFE, ANIMAL SMELLS, SOUNDS ETC.] Valiano is none of these things. Not only is this a significant impact but it is an existential impact: our community would be destroyed if Orange County-style developments like Valiano are squeezed into our little bucolic valley.
- **Septic:** Our community plan calls for septic, not sewage treatment plants (again, not rural). This is inconsistent.

Fire Safety Examples:

I am very concerned about the impacts that this project will have on my safety and those of my community.

- From the DEIR it is clear that they have not taken into account the most recent fire, Cocos Fire. [INSERT PERSONAL ANECDOTE ABOUT THE FIRE]. The DEIR states most fires come from the East, when the last few fires, including Coco’s came from the West.
- The 326 houses proposed will make evacuation a very difficult proposition. The DEIR does not show how evacuation will proceed during a wildfire event. The only egress, Country Club Road, will be at LOS F (according to the DEIR) and evacuation on this two lane road will be hazardous and create a fire trap. [INSERT EVACUATION ANECDOTE]. On the other end of the valley, San Elijo Road (which is a 4 lane road emptying into a 6 lane road) had people sitting in their cars for over an hour as flames were visible overhead on Double Peak. Had the fire not changed direction towards Harmony Grove as they did, you would have had a tragedy

on your hands. Country Club is only a 2 lane road with LOS F. It is facing evacuation traffic from 742 houses at HGV, 325 houses at Valiano in addition to the trailers for upwards of 180 horses in Eden Valley.

- The Fire Protection Plan (FPP) makes no mention of evacuating horse trailers and how that would impact evacuation. Please address this. We have twice as many horses in Eden Valley than we have houses. Trailers are slow, hard to maneuver, big and, importantly very hard to load animals on to. There is only one way out of that valley: Country Club Road towards Autopark way. If the fire comes west, like it did during Cocos there will be a massive traffic jam (LOS F means bumper to bumper traffic in non-evacuation circumstances) that could doom residents to a death trap. This is significant and not mitigated.
- The response times from San Marcos Fire District would be 7.5 minutes (above the 5 minutes standard). The DEIR assumes mutual aid from a fire station that hasn't been funded (at HGV) so that fire station cannot be used in the analysis. They are offering to pay into that fire station, but not Escondido Fire which will likely be the first responder. This is significant.
- Additionally, they are increasing our risks by asking for (and have already received) a variance on road width on Hill Valley because they don't have easements to widen it. It is not wide enough for two fire trucks to pass side by side. SMFD gives them the variance, but other FD will likely respond (and deal with the safety consequences). **This puts us at more risk as firetrucks will have reduction of access to Hill Valley Road.**
- They are assuming existing home owners will be responsible for Fuel Modification Zones, an encumbrance to those landowners.
- Lastly, the FPP focuses exclusively on the impacts to *the project* but no reference to how it will jeopardize the wellbeing and safety of existing community.

Traffic Examples:

- [SEE EVACUATION ISSUES ABOVE]
- No analysis was made of the traffic heading West towards Elfin Forest Road. We know, from observation, that the traffic flow is more than 6% as stated in the DEIR. There is also a bottle neck at San Elijo Road.
- The intersection of Country Club and Autopark Way (the main ingress and egress of the project) is already majorly congested. [INSERT ANECDOTE]. Even now, without HGV built out, we sometimes have to wait two light cycles just to turn left onto Auto Park Way. What's going to happen when all the houses from HGV and Valiano go in? This is an unacceptable, unmitigated impact.
- Furthermore, when the Sprinter comes by every 30 minutes (and soon, it will come every 15 minutes, according to NCT) it becomes even more congested. This impact is significant and unmitigated properly in the plan.
- Citracado Parkway has not been funded yet and there is no indication as to when it might come online. The traffic study doesn't reflect that correctly.

- The sight lines at the intersection of Mt. Whitney and Country Club as well as those at Hill Valley and County Club do not meet county standards.

Equestrian Examples:

The applicant’s attempt at incorporating a small number of equestrian lots to somehow check the box on rural and equestrian fails on a number of levels.

- First, there aren’t enough equestrian lots. We are an equestrian community and outnumbering equestrian houses with non-equestrian houses will tip the balance against horse-keeping and more towards suburban living.
- Shoe-horning horses and stalls onto 1/3 acre lots along with a two story house and garage makes it less likely that the property will be used for horse-keeping. There is barely enough space for a horse to be kept humanely when you include it’s food, tack, trailer for hauling, and manure management.
- A horse eats at least 600 pounds of hay a month and produces 500 pounds of manure and soiled bedding every week. On a 1/3 acre lot, there is really no place to pile manure or store hay in a safe manner. Hay, if not kept correctly, can spontaneously combust. It is the cause for many a barn fire.
- This project would represent an irreversible loss of Equestrian Capable lands and is incompatible with the current residents community character and existing uses.

General Plan Incompatibility:

If the project is allowed to proceed as proposed it will be in direct conflict with at least two of the initiatives contained within the County’s Strategic Plan. Specifically:

- *Make neighborhoods healthy places to live, work and play*
 - The noise, air pollution and traffic associated with this project would make my neighborhood a markedly unhealthier place to live, work and play compared to today
- *Help communities prepare, respond and recover from public health threats, environmental hazards and other emergencies*
 - If this project was built as proposed, the inability to evacuate safely and in a timely manner during a wildfire would leave my community far less able to respond to such an emergency

Visual Character Examples:

The project will be introducing elements that drastically change the aesthetics and visual character of the community in a permanent and significant way:

- Extensive grading, manufactured slopes of up to 60 feet tall;
- 1000 foot walls of up to 20 feet tall, extensive fencing, retaining walls and sound walls,
- not to mention the clustered nature of the development with very high density housing scattered around the project area.
- The DEIR seems to hugely downplay these impacts and show very vague photo simulations (with far away vantage points) which do not show the true nature of these visual and aesthetic impacts.
- Goes against General Plan policy COS 12.1 (does not preserve hillsides and ridgelines, mass grading of natural landforms).

Air Quality and Green House Gases Examples:

According to the DEIR, the project will have significant and unavoidable air quality impacts and no way to mitigate these impacts.

- More than doubles the vehicle miles traveled (VMTs).
- They don't show that a project with fewer units is infeasible.
- They claim green credentials by exceeding Title 24 standards from 2008, but newer standards are currently in place (2013) which are even more stringent (and they do NOT meet these standards). This seems disingenuous or at least erroneous.
- There's a new executive order put in place by Governor Brown (4/29/15) which requires an even greater reduction of Green House Gases. The DEIR should be revised to show whether or not it meets this new reduction target.

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Where to send your comments before 4pm:

Please email PDS and cc the rest of the contacts below.

To: County Planning and Development Services (PDS) Staff:

- Dave Sibbets: David.Sibbet@sdcounty.ca.gov
- Beth Ehsan (assigned planner): Beth.Ehsan@sdcounty.ca.gov
- Maggie Loy: Maggie.Loy@sdcounty.ca.gov
- Kristin Blackson: Kristin.Blackson@sdcounty.ca.gov
- Mark Wardlaw (Director of PDS): Mark.Wardlaw@sdcounty.ca.gov
- If by mail: 5510 Overland Avenue #110 & 310, San Diego, CA 92123

cc: County Planning Commission:

- Lisa.Fitzpatrick@sdcounty.ca.gov
- If by mail: County of San Diego, Planning & Development Services, 5510 Overland Avenue, Suite 110 San Diego, CA 92123

cc: Board of Supervisors:

- greg.cox@sdcounty.ca.gov,
- dianne.jacob@sdcounty.ca.gov,
- dave.roberts@sdcounty.ca.gov
- ron-roberts@sdcounty.ca.gov
- bill.horn@sdcounty.ca.gov
- if by mail: 1600 Pacific Hwy #335, San Diego, CA 92101
- phone: [\(619\) 531-5600](tel:6195315600)

cc: San Dieguito Planning Group

- Bruce Liska: bruce.bettyliska@gmail.com
- Doug Dill: douglas.dill@att.net

cc: Town Council: efhgtc@gmail.com

The Application and D-EIR can be found here:

<http://www.sandiegocounty.gov/pds/regulatory/docs/valiano.html>

Janean Huston & FEVRD

Friends of **E**den **V**alley for **R**esponsible **D**evelopment

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