

Ehsan, Beth

From: jim E <jlrbrock@gmail.com>
Sent: Monday, June 15, 2015 12:03 PM
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-Roberts; Horn, Bill; bruce.bettyliska@gmail.com; douglas.dill@att.net; efhgtc
Subject: Opposition to Valiano Draft EIR (PDS203-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2014-MUP-14-019, PDS2013-STP-13-003, PDS2013-13-08-002)

I'd like to take a moment of your time to express my strong opposition to the Valiano project referred to above in the subject line. I am a homeowner in Elfin Forest who has lived in this beautiful area for 3 years. My wife and I moved to the area to get away from the crowded, densely packed track homes which pervade the entire La Costa area where we previously lived. We chose the Elfin Forest/Harmony Grove area to move to because it had a Community Plan which managed population density so that we could live a rural lifestyle.

My main opposition to the Valiano project is based on the impact it will have on evacuating the valley in case of a wildfire. Last May I was working in my barn when I noticed a plume of smoke in the air to the northeast. That plume of smoke was the start of the Coco's Fire. Recognizing the danger of staying put, my wife and I loaded our three horses into a trailer, gathered our other animals and some important papers and started north on Elfin Forest Rd. As we neared San Elijo Middle School it became obvious that the traffic wanting to go down San Elijo Rd was in a state of gridlock. Everyone in the San Elijo Hills development wanted to go west to get away from the oncoming fire. Had the fire maintained it's southwest course, the tragedy of the Coco's fire would have been much worse than it ended up being.

I decided not to wait in the gridlock of San Elijo Hills. Instead, I made a u-turn (try that sometime with a horse trailer), and headed south and then east on Elfin Forest Rd toward Escondido. Fortunately the traffic this way was much lighter. We were able to pass through Escondido, get our horses to safety, stay with a friend for a few days, and hope and pray that our home and neighborhood were safe. I remember thinking as we passed the area of the new Harmony Grove development that the traffic would likely have been just as bad as the San Elijo traffic if those houses had been built and occupied at the time of the fire.

It's not a question of if another wildfire will occur in this area, all of the fire experts say it's merely a question of when. The population density at San Elijo Hills effectively prevented the folks of Elfin Forest from using that direction as an escape route from the Coco's Fire. Increasing the population density in Harmony Grove, will effectively prevent the folks of Elfin Forest from using the only other direction available to them when the next fire comes. We will be stranded, subject to the vagaries of the fire and the bravery of the consolidated Fire Departments. You can prevent this danger. I urge you to err on the side of safety and not increase the population density in Harmony Grove with the Valiano project.

Regards,
James R Ellerbrock
7102 Circa de Media
Elfin Forest, CA 92029
760-761-0581

Ehsan, Beth

From: Jean-Francois Erforth <jeanoerforth@gmail.com>
Sent: Monday, June 15, 2015 1:46 PM
To: Sibbet, David; Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark; 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
Cc: EFHGTC
Subject: Re: 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

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 Jean-Francois Erforth and I live on 7753 Camino Sereno in Elfin Forest since 2007 and in North County since 1995.

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.

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 wife 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

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.

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.

Sincerely,
Jean-Francois Erforth

7751 Camino Sereno
Escondido, CA 92029

14 June 2015

To: beth.ehsan@sdcounty.ca.gov

Re: Valiano Plan, 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

Ms. Ehsan:

Thank you for the opportunity to comment on the Valiano project. We live on Camino de la Cima, due west of the project. The impact to us personally is tremendous and has not been assessed as part of the published study. For example, our view will contain this new neighborhood instead of the rural open spaces we bought the house to enjoy.



Wild bobcat next to the house, Valiano proposed site in background

The noise impact of sounds carrying up from the valley will be tremendous. We currently hear every event that Stone Brewery puts on, and this project adds several hundred families' worth of noise in between that establishment and us.

The back side of the retaining walls described in the Visual Impact Analysis will face our home (and we did not see any plan to fully finish the up-to-20'-high wall on the back to blend in with our current view). The relative seclusion of our house will be no more.

We have a worst-case mental picture of people hanging out, throwing cans and cigarette butts into our brush, looking up at our once-private home from behind a graffiti-covered cinderblock barrier and wandering off into our yard when they want additional privacy. Naturally, we are concerned. But there are also intrinsic problems with this project that have nothing to do with us personally.

When looking at the impacts of this development on the surrounding area, it is important to take the reports together in conjunction, rather than each on its own. These impacts are all inter-related. By far, the largest issue is fire protection.

For example, in Technical Appendix L, emergency response times were assessed based on current traffic on Country Club Drive, and even then the response times exceeded the required five minutes, showing seven at a minimum (Section 4.1).

Meanwhile, the Traffic Impact Analysis (Technical Appendix H) also indicated that there would be a significant direct impact to traffic on Country Club Drive between Auto Park Way and Hill Valley Drive (Section 9.1.2) that would significantly increase this time, even during normal non-evacuation conditions.

We have recent real-world nearby experience in emergency conditions. To travel the 2.1 miles from the corner of Craven and Twin Oaks Valley Road to Camino de la Cima during the Cocos fire in 2014 took **28 minutes**.

If over 1000 homes are being evacuated at once from Valiano and Harmony Grove Village, all via the same rural route, fire equipment will be completely blocked. This is true even if a notional new fire department is built in Harmony Grove Village 2.22 miles away, farther than the distance in our example.

In 2014, the emergency response equipment on Barham Drive was forced to drive westbound in the eastbound bike lane to make any headway through the crowds. There is no such planned bike lane on Country Club Drive.



Fire truck attempting to navigate gridlock on Barham Drive, May 2014

There is no means of egress from Valiano from the north, south, or west. While the Fire Protection Plan indicated that a fire coming from the west was unlikely, that is exactly where the fire came from in 2014 (there is a perpetual west-to-east breeze at all times). With no other means of escape, though, FIREWISE 2000's report that the most likely scenario is an east-to-west fire should not be of any comfort.



Proposed Valiano site after the Cocos fire in 2014

In addition, the environmental impacts of the planned community were bounded by the borders of the lots in question. However, the planned road alterations, additional infrastructure, and other supporting development needed to sustain a neighborhood of this size will also have lasting impact on the wildlife and ecological resources currently in that open space.

Our home is situated in an area with extensive wildlife. In addition to snakes, rodents, and other smaller creatures, we have populations of deer, coyotes, and bobcats on-site. Their habitats have already been devastated by the fires, but have a chance to come back. Building hundreds of houses there will not provide the habitat with the chance to return.



Pack of coyotes on our driveway



Sampling of wildflowers on the property (all photos taken 17 May 2015)

We moved here because we prefer a rural way of life. For a developer to plunk a giant subdivision right in the middle of our rural community goes against the core identity of who we are. It's not a densely populated area, so the number of individuals able to rise up and protest this development is smaller, but our views are no less important. Beyond that, the residents who would move there would clearly not be safe in wildfire conditions.

We strongly object to the plan to develop the Valiano project as proposed.

Thank you for your time,
-Carolee and Charles Eubanks

Ehsan, Beth

From: Melissa Ferrel <melissa.schwegel@gmail.com>
Sent: Monday, June 15, 2015 2:41 PM
To: Sibbet, David; Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark; Cox, Greg; Jacob, Dianne; Ron-Roberts; Horn, Bill; bruce.bettyliska@gmail.com; douglas.dill@att.net; efhgtc@gmail.com; Fitzpatrick, Lisa
Subject: opposition letter to 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

Dear Planning department and City Leaders-

I am writing this letter in hopes that my voice will be heard and will mean something in opposition to the proposed Valiano Development. I live off of Fortuna Ranch Road in Olivenhain and was a first hand witness to the fire evacuations with the recent Cocos fire. We saw trailer after trailer passing along the dirt roads in Elfin Forest and through Fortuna Ranch road, onto Lone Jack and Rancho Santa Fe. Most of the people left well before their evacuations and some were actually evacuated, some were not. I cannot imagine what would have happened if the fire would have spread and there was a sudden evacuation, these people were barely crawling though the dirt roads trying to protect their animals and live stock. The Elfin forest, Harmony grove area only has a limited number of ways in and out, most of them not being substantial enough to handle heavy traffic which this development would create, especially in an emergency situation.

On the subject of traffic impact, here on Fortuna Ranch Road we have had long term problems with people trying to commute to or from Escondido and taking the back roads to do this. They race down Fortuna Ranch Road and our neighborhood is up in arms about it. We have approached the city and have been told we cannot have speed bumps because the fires responder time is already at a maximum to get to the homes at the end of our road and they cannot afford to slow that down. In return, the safety of our neighborhood and our children is jeopardized by vehicles flying down our road at speeds well above 50mph. I cannot imagine what our quality of life will be like if that number is to multiply by adding hundreds more homes. Not to mention that Lone Jack road with its hair pin turns is hardly equipped for more traffic either.

Our water district has been told by the state that we need to cut our water consumption by 35% this year, a feat they know will probably not be possible and will therefore raise rates. Slowly we are letting our mature trees and plants die, changing the air quality, taking away shade and creating a hotter climate. I have to ask how do we have enough water to sustain hundreds of new homes when all of our water districts are trying to cut back to come inline with the states new guidelines. We need to stop the growth that our natural environment can no longer sustain.

I am a very concerned resident who is opposed to a project that is jeopardizing our health, safety and rural values. Please strongly consider our stance.

Sincerely,

Melissa Ferrel
619.929.6299

Ehsan, Beth

From: Tom & Michele Hardy <tnmhardy@pacbell.net>
Sent: Wednesday, May 27, 2015 4:31 PM
To: Ehsan, Beth
Subject: Harmony Grove Homes

Dear Madame:

I have been a home owner in Escondido for 27 years and moved here for the country openness and hospitable people as well as to be nearer the animals, birds and trails in the Lake Hodges area. I also wanted to live in a multicultural community where the environment was respected. At the time I moved here, there was a clear no growth policy in place.

Recently, I viewed the Harmony Grove homes which will be open to the public on May 30. I also looked at the future plans for this area. We have no water and by all reports the water shortage will continue longer than ever before. The roads are heavily congested today with no new people moving in. Harmony Grove will look like Del Sur, a congested area where homes are jammed in next to one another in a really unappealing manner. Ecologically, we cannot support more homes in what was the pristine Harmony Grove area. The environment cannot take another assault! Please do not build any more homes in this beautiful part of San Diego County.

Sincerely,
Michele Hardy, Ph.D.

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 Angelique Hartman and I've lived on Country Club Drive in Harmony Grove for 2 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, the HG Community Plan and that of the Community.

I personally urge you to reject this GPA, and make the responsible decision to honor what the Community negotiated over the course of several years in the GP Update.

I personally urge you to help uphold our Community Plan, the Harmony Grove Village Plan, which clearly spells out what is acceptable in our rural community.

While I have mentioned some items below, it is certainly not all encompassing. But, with human health and safety topping the areas of concern, I also ask that you carefully consider personal testimony and data that most of us living in the area can attest to first hand. For newer members of the community like myself, I can say that I presently live in one of the most unique places in the County. It is no shock that a developer would want to market such a wonderful area. We do seem to have it all. But with that said, we also have an obligation to make sure that responsible decisions are made with current data. We have a wealth of data that was overlooked or dismissed in this proposed DEIR. Please find below some of these omissions.

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 no traffic lights, no street lights, dark skies, quiet peaceful day and nights, sounds of horses and large animals, great horned owls at night, loud calls of pacific tree frogs in the evening, creeks with bass, rattlesnakes in my backyard, deer in the valley, bobcats, tractors working their land, neighbors helping one another build a barn, wells, septic not sewer, unique homes-not cookie cutter planned with HOA's, private roads, community get together in corrals, farmers, horse trailers, large lots (minimum of 2 acres), two lane roads, hills with grasslands and chaparral, mountains surrounding our backyard. 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.

Fire Safety:

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 GP should not be amended to allow a density increase in an already high risk area for severe fire and human health risk. 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.

During the Coco's Fire traffic was backed up on Country Club Drive going North. Residents from Harmony Grove were stuck in traffic for more than an hour trying to reach the 78. Traffic was also impacted by the number of Fire Engines trying to get in as residents were evacuating. None of this is discussed in the DEIR.

Fire Storms have become more common in our area. 95% of all fires are started by humans intentionally or not. Fire Storms create a different kind of community disaster, whereby depending on how many fires are going at once, you may not have your most knowledgeable local fire station at your front door. Because outside resources must be used, these outside resources are not as prepared and knowledgeable of the unique circumstances that exist in each community. They may not know about all the access routes, or lack thereof, the location of a Fire Hydrant, the water pressure issues at some locations etc. This needs to be analyzed in the EIR. We should not have to keep relearning from disasters, like the 2003 Firestorm that took 23 lives right here in San Diego. The highways couldn't even support the 500,000 people trying to get to safety from the Fires.

Adding more 'fuel' in the shape of 326 units, to create a wildland/urban interface is at best irresponsible and completely avoidable. Creating a death trap to the community is shameful.

Our property burned in the 2014 Coco's Fire. I can testify at how fast moving this fire was. Within a couple of hours it went from plumes of smoke visible to a fire right on my ridgeline. I watched spot fires explode all along the Coronado Hills as we evacuated on Country Club Drive. I saw panicked people loading up their cars and trailers. What if this had happened at night? This is what keeps us up at night, what if...will we be able to evacuate with HGV built out. Valiano will be an insult added to injury to our already failed traffic and fire safety from taking our 'fair share' of growth with HGV. Because this was a Fire Storm event, we had a non-local engine come defend our house. There was

only ONE Fire Engine on my street (The southern terminus of Country Club Drive). We lost the most homes here in Harmony Grove (26 Homes all surrounding our residence- this doesn't include out buildings). How could this have happened? The Engine was from LA County, they stopped at our house only because we had a water tank. They had no water left on the engine. By the time they stopped and found my water tank empty (Due to the Level 2 Drought), they were running for their lives as the Fire exploded out of HG Spiritual Association- a 100 foot wall of fire racing towards them (Winds from the West). The only thing that save our home (and possibly their lives), was a drastic change in wind direction. It moved south. It gave them an opportunity to defend our house. They put out fires on our roof and front deck. We lost all of our out buildings, garages, landscaping, and much more. We lost our neighbors. Imagine this fire with an added 1000+ homes in the valley. This fire was not manageable with the existing density in HG.

- The FPP should analyze the Fire Storm patterns and the repercussions of having to resort to outside Fire Districts that are likely NOT familiar with conditions on the ground. It should analyze the significant lack of available resources to adequately fight the fires in this kind of circumstance. This puts our lives and homes at risk, and the lives of our first responders at risk.
- Lastly, the FPP focuses exclusively on the impacts to *the project* but no reference to how it will jeopardize the well-being and safety of existing community.

Traffic: The intersection of Country Club and Autopark Way (the main ingress and egress of the project) is already majorly congested. The project should not be given a GPA, as the GP was put in place to allow for density in this area that the infrastructure is capable of handling. 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. 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. This also impacts safe evacuation during a Fire.

- The traffic plan should work in unison with the FPP, with regards to an evacuation plan.

Construction Related Impacts:

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 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.
- Blasting from the HGV development was very telling. Despite our home being outside of the deemed potentially impacting zone, our home shook like we were in an earthquake. Our house succumbed to cracks in the sheet rock of the walls, and it also cracked the marble tiles in our bathroom. We notified the Developer and they didn't agree with this finding. Mitigation should include a per-inspection of all homes in Eden Valley and Harmony Grove prior to blasting for per-existing condition data. The granite in our valley is very hard, and it required more blasting than HGV anticipated. This is data that should be analyzed in the DEIR for Valiano.

Air Quality and Green House Gases

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.
- How was air quality impacted by the Coco's Fire? There is an inversion layer in the valley, and because of the micro climate here air can become trapped for a long time that contains a high number of contaminants. Increasing the fuel load in

the valley also increase the odds of more airborne particulate of toxic concentrations during a wildfire.

Biological Resources

“General biological surveys of the Proposed Project site were conducted, according to County Requirements, by HELIX on October 18, 2011, February 17, 2012 and November 21, 2012. The new addition of the Tentative Map was surveyed on February 17, 2012 and the sewer options alternative alignments were surveyed on July 22, 2014.”

Comment: Despite multiple field reconnaissance surveys, there is no mention or analysis of the impacts from the May 2014 Cocos fire in the biological technical report. More than 90% of the project footprint burned in this fire, and all of the proposed biological open space areas have burned.

Where onsite mitigation has been used, in these biological open spaces, there should be a restoration plan in place should the vegetation community not restore to its previous condition by which it was used for mitigation. The agricultural/non-native grassland interface with areas of native vegetation/sensitive vegetation communities are at a higher risk of becoming invaded by non-natives and invasive species post fire. If this is not possible, then mitigation may need to be applied offsite as well. This applies to the following vegetation communities (Table 2.4-8 MITIGATION FOR IMPACTS TO HABITAT/VEGETATION COMMUNITIES): Southern riparian forest (61300) , Southern riparian woodland –including disturbed (62000), Southern willow scrub (63320) Mule fat scrub (63310), Freshwater marsh (52400) , Herbaceous wetland (52510) Disturbed wetland (11200), Open water/pond (64140), Coast live oak woodland –including disturbed (71160) Diegan coastal sage scrub –including disturbed (32500), Southern mixed chaparral –including disturbed (37121) Eucalyptus forest (79100) , Eucalyptus woodland (79100), Non-native grassland (42200), Non-native vegetation (11000), Orchard (18100), Intensive agriculture (18200), Extensive agriculture (18300), and Disturbed habitat (11300) (this should be explained-disturbed what?).

Recommendation: Review the current biological resources post fire (Vegetation Mapping, biological surveys etc), and amend the data as necessary for each area. Provide a Restoration Plan for the biological open spaces to ensure that on-site mitigation is indeed of like-kind. If on-site mitigation is no longer feasible for these impacts, propose alternate mitigation measures or avoidance measures. We suggest that the biological open spaces be expanded and connected to allow for more species to move inside the local wildlife corridors, this will also protect the seedbanks so post fire vegetation will recover more successfully. The fire does not impact mitigation for pre-existing condition, but it does impact post fire mitigation onsite and offsite (still need

to ensure that 1.8 acres of Diegan coastal sage scrub is mitigated for-even if offsite, for example).

Technical Appendices-Biological Technical Report Appendix D

According to Appendix D, Pages D-7 through D-9, there are several animal species of special concern and county group 2 species with moderate or low to moderate potential to occur. Many of these species were not properly surveyed for, which would require special survey. It is our conjecture that there should have been bat surveys and mammal trapping to determine if these special species of concern listed in Appendix D are present. Bats are in abundance in this valley, particularly because of the fresh water features, the agricultural and non-native grasslands foster a lot of insects for foraging, dark night skies, minimal noise, and the tall trees and woodlands that provide potential roosting and resting elements. There are also a number of rocky outcrops on the western slopes just below Coronado Hills (where the project proposes extensive blasting) and nearby to the east along Country Club Drive that would provide roosting opportunities. Residents have had bats roost in their eaves, and there are reported bat boxes in the project area. Without a bat survey it would be difficult to determine what species are present, and how to mitigate for a nesting maternal roost site, and impacts to their foraging sites. Residents report a high number of bats in the warmer months, and have enjoyed this natural vector control for years.

There are a high number of rodents in the project area, particularly because of the agricultural and non-native interface with native vegetation which is commonly used for many species. Because the Northwestern Pocket Mouse is a listed California species of special concern/County Group 2 species- and has a moderate potential to occur, it likely needs trapping surveys to determine its presence, we feel this is another survey that was missed in the Biological Resources Studies.

Recommendation: Conduct Mammal Trapping Surveys, and provide appropriate mitigation or avoidance measures. Conduct Bat Roosting and Foraging Surveys and provide appropriate mitigation and/or avoidance measures. Because Bat habitat is an understudied area of expertise, and most species are becoming protected, we recommend if roosting sites for bats are located, that they be protected and avoided. Rock outcroppings on the western side of the development for example, should be avoided.

From Table in Appendix D: SENSITIVE ANIMAL SPECIES WITH POTENTIAL TO OCCUR

Species that should be surveyed for include: Pallid bat (*Antrozous pallidus*) low to moderate potential to occur, Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*) moderate potential to occur, Western mastiff bat (*Eumops perotis californicus*) Low to moderate potential to occur, Small-footed myotis (*Myotis ciliolabrum*) Low to

moderate potential to occur, Long-legged myotis (*Myotis volans*) Moderate potential to occur, Yuma myotis (*Myotis yumanensis*) Moderate potential to occur.

It should be noted that the LBV and CAGN had a low potential to occur on site, yet protocol level surveys were conducted (we agree to this, just noting that other species surveys should be conducted given the higher potential to be present onsite).

Indirect Impacts/Edge Effects (Guideline No. 8) Page 2.4-21

"Edge effects can result from increased noise, unauthorized trampling of habitat, introduction of pets and pest plants to open space areas, and effects of irrigation and lighting. Project implementation would potentially cause in direct impacts from construction noise, human access, domestic animals, exotic plant species, and lighting. ...Permanent fencing would be installed around biological open space, and signs precluding access would be posted to avoid potentially significant impacts from human access....The Proposed Project is residential in nature, so domestic predators (e.g., dogs and cats) may be introduced to the surrounding habitat. Although such introductions have potential to harm native wildlife species, the site is adjacent to existing rural residential development and is already subject to some level of disturbance and predation by domestic animals. In addition, the aforementioned permanent fencing that would be installed around the biological open space would preclude access by domestic predators to avoid potentially significant impacts."

Recommendations: The proposed fencing around the biological open spaces is supposed to keep out humans and predatory domestic pets like cats and dogs. It is a three strand wire fence. While we do not want a wall around the biological open space (wildlife should be able to fluidly come and go to breed/forage), we feel there should be strict regulations about allowing pets off leash and prohibit the residents of the Valiano development to let cats outside. This fence will not preclude dogs and cats, which are the most common predatory threats to wildlife in an urban/wildland interface. Therefore this fence is not a satisfactory mitigation measure in itself.

In addition, because the biological open spaces are disconnected from one another, and circumvented by roads and structures, and FMZ, these islands of open space create a very dangerous and unfavorable situation for the wildlife. This should be included in the edge effects discussion. Wildlife will cross the roads and be subject to roadkill. Wildlife will seek other foraging opportunities and likely be killed by cars, or humans that do not welcome creatures like snakes, reptiles, and rodents. Urban minded people don't usually appreciate wildlife like their rural neighboring counterparts. In addition, the development should limit edge effects by limiting use of pesticides,

herbicides, and other potential toxic sources that will have indirect effects to the wildlife and contaminate the natural water courses from which they depend.

The Biological Open Spaces should be created in a way that allows for natural wildlife corridors that are already onsite. Preservation of these corridors will allow safer movement between foraging and possible breeding locations on the project site for wildlife. Many of the natural drainage features already on site would be good avenues for this connectivity and decrease the impacts from the proposed plan, if they were preserved.

We propose further avoidance of impacts to natural resources by decreasing the number of units that are surrounding these biological open spaces, and by eliminating roads that circumvent them. Currently the project design by nature, does not allow for a less than significant impact.

2.4.5 Mitigation

M-B1-1a and b

Recommendation: Because wildlife is consistently observed by residents using non-native grassland and extensive agriculture (pasture) for foraging particularly in Neighborhood 5, and seven County Group 1 animal species were observed in these areas, we propose that mitigation ratios should be consistent. NNG and Extensive Agriculture (pasture) should both be mitigated for at a ratio of 1:1.

M-B1-3a, 3b, 3c, 3d, 3e

Recommendation: Check for availability to mitigate these impacts with our local agency The Escondido Creek Conservancy (TECC)

M-B1-3f

Recommendation: Mitigation for impacts to 6.7 acres of Coast live oak woodland should all be mitigated for at a ratio of

3:1.

M-B1-7

Recommendation: In order to ensure compliance with the MBTA, a qualified biological monitor shall be present at all times during construction related activities if they are being conducted during the bird breeding season (February 1-September 1)

Other mitigation recommendations:

During construction, a biological monitor shall be present at all times to determine if there are any sensitive wildlife species that need to be removed/relocated that are in the project site before grading and earth moving. In addition a monitor will make sure that any animals that could become trapped in ditches/holes/construction features that are created by earth moving activities are removed safely. Given the high likelihood that sensitive species are in the area that can become trapped in man made structures/features (like Coastal Rosy Boa, Red Diamond Rattlesnake, Orange throated whiptail, coast horned lizard, Coastal whiptail, and Coronado skink) we feel this measure would mitigate for impacts to sensitive species that are not capable of dispersing.

I urge you to oppose the HLP for impacts to 1.8 acres of CSS.

The proposed project will directly and indirectly impact 1.8 acres of Coastal Sage Scrub (CSS) associated with the Valiano Specific Plan as shown on the attached Habitat Loss Exhibit dated April 23, 2015.

Because the CSS habitat is in areas that are in proximity to the proposed Biological Open Spaces, it makes more sense to avoid this irreversible impact, and minimize the project footprint to incorporate this sensitive resource into a larger Biological Open Space.

Coastal Sage Scrub-land is a vital ecosystem of its own that is home to many species that are endangered or in need of protection. Too much of this land has already been destroyed in the name of urban development; the results of further destruction in our communities would be devastating.

This devastation does not only impact the ecosystem that is being destroyed. It is also harmful to properties surrounding the coastal sage shrub-land that have already been developed. These properties are quickly losing any protective buffer that the shrub-land affords from flooding during heavy rains. Coastal Sage Scrub vegetation is still slowly rebuilding itself from the massive destruction of the 2003 and 2007 wildfires, and the recent Coco's Fire from 2014.

Nearly one-third of the entire Coastal sage shrub-land in San Diego County was destroyed (32.6% or roughly 81,000 acres) in 2003. While this area is not known to be occupied by Coastal California gnatcatchers, there are populations less than a mile from the project site. Typically, coastal California gnatcatcher populations recover from fire within several years, the time that it takes coastal sage scrub to regenerate post-fire; however, the 2007 San Diego County census found extremely few California gnatcatcher territories had re-established after the 2003 Cedar Fire. The extent of the 2007 Witch Fire may have even longer-lasting effects on this species. What remains must be protected, not subjected to further destruction under the guise of urban progress.

But also importantly, alternative regulatory mechanisms to ensure protection are not in place over large portions of the gnatcatcher's range. Not only are development threats unabated in many areas, including our own, but throughout the gnatcatcher's range, even in preserve areas, repetitive fires have wiped out gnatcatchers in many locations, with "type conversion" to inhospitable weeds a sign of permanent habitat loss. Finally, since the original listing in 1993, climate change has emerged as a threat, with models showing severe potential sage scrub loss. A wide range of occupied and suitable locations must be protected for long term survival and recovery. This includes areas that are known to be occupied, and areas that are not occupied for future growth of the species, and for the integrity of this unique and diminishing resource.

Sincerely,

Angelique and Gus Hartman
Harmony Grove Residents

Coco's Fire Survivors

Ehsan, Beth

From: Nancy Henderson <nancy4art@sbcglobal.net>
Sent: Saturday, June 13, 2015 9:04 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
Subject: Oppose the Valiano Project

Dear Members of the Board and Decision Makers,

I was at the meeting Weds night and was impressed by the presentation by the local community to oppose the Valiano Project.

Out of curiosity, I just drove through the proposed site-- Mt Whitney Roads and Eden Valley Roads, and urge each of you to do so as well.

I can't imagine 100 new homes in there let alone 400! The area would require a huge amount of blasting and grading. It is completely unsuitable for a large scale development. The roads wind up and down and around existing properties. I can't imagine heavy equipment traveling them.

The fire evacuation danger alone-- coupled with the new traffic which will be from Harmony Grove Village is enough to completely reject the project. Maybe 50 horse property homes with no grading is suitable-- this would be in keeping with the character of the existing community.

We cannot allow our inadequate road system coupled with already overdevelopment to result in a death trap for people who are trying to evacuate in a fire condition. People panic, horse trailers have a much harder time in evacuation-- and there are 300 horses in Eden Valley as it is. Adding 400 homes to the area with 800 cars and more horses to evacuate is unconscionable and dangerous.

Additionally-- San Diego will sooner or later have to amend their policy of expanding due to demand from people seeking homes. Lets be realistic here and stop giving water permits out to the greedy developers. Especially those from urban sprawl areas. We don't want to live in a Los Angeles or Orange County-- and our extreme water shortage is a factor not taken into consideration here. Lets plan ahead on this.

Quality of life is why people move here. I moved to above Harmony Grove because I am a nature lover-- I love the dark skies, the animals, the peace and quiet-- the friendly atmosphere. I am a huge supporter of the Escondido Creek Conservancy because I see the wisdom in preserving Nature.

Please limit ALL development in this area. We agreed to Harmony Grove Village-- that was our concession. Our roads cannot handle any more than this-- people are moving out of Harmony Grove and Elfin Forest in droves as they realize the development on either end puts them in danger of loss of life in an emergency situation like our last fire. I personally am fearful already when I exit from Wilgen Road onto Harmony Grove Road-- this is an unsafe intersection, and the developer did not take into consideration that there should be a left turn lane and a wider road there. When 60-100 more cars exit and enter this when the Harmony Grove Wilgen section is complete and traffic on Harmony Grove is quadrupled in the near future-- you will see the accident rates climb-- and this is directly related to allowing overdevelopment.

We can't live in fear for our lives. This is a wildfire prone area-- don't put our lives in danger. Please limit the homes to 50-- and NO more development in this area.

Thank you,

Dear Ms. Ehsan,

The following are my comments on the Valiano Specific Plan DEIR (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)

General Plans need to be dynamic “*to respond to changing community needs.*” In the case of Valiano, the applicant has stated that the “need” provoking this request for a GPA is more homes, closer to infrastructure, in accordance with smart growth principles. The current, updated General Plan (GP) has adequately addressed that need, and created a growth plan to meet the SANDAG estimated population with well-studied and minimal adverse impacts. That was the reason the entire Elfin Forest/Harmony Grove/Eden Valley community supported the 742-home Village CDM. The last review of the GP in the spring of 2015 found no change was necessary to meet projected population growth. There is no predicted housing shortage. Thus the particular changing community need provoking this GPA has not yet been established by any research-based evidence. The applicant should identify this need and provide appropriate supporting documentation.

The second requirement for a GPA is that the response must be in the public good. Traffic and fire safety evidence from this DEIR show this GPA will increase the risk of entrapment and death during fire evacuations and therefore significantly impair the public good. The applicant should establish how their response meets an identified community need while not endangering public health and safety.

Lastly, this GPA, if approved, will change the Harmony Grove Community Plan and require extensive revision of the existing conditions, vision statements, goals, issues, and policies; in effect, allowing the applicant to significantly and possibly adversely impact the future growth in the associated communities of Elfin Forest, Harmony Grove, and Eden Valley. Even restricting the Community Plan revisions to the Valiano specific plan area would set a precedent that would not only cause serious concern in Elfin Forest, but also significantly impair the degree of similarity in housing, attitudes, and interests that these two communities currently share. To protect its own Community Plan and critical rural interests, Elfin Forest may find it desirable to disassociate from Harmony Grove, its partner community since the inception of the Town Council in 1978. The impact of the dissolution of the long-term partnership of these two communities on the more economically disadvantaged Harmony Grove should be studied and mitigated.

I strongly advocate the consideration of an alternative project that would not impair the Community Plan of Harmony Grove, that is, build out neighborhood 5 with 1- and 2-acre lots on septic systems with horse-keeping privileges, as specified in the Harmony Grove Community Plan.

Sincerely,

Mid Hoppenrath
2640 Harmony Heights Road, Harmony Grove, CA 92029

Ehsan, Beth

From: jlhorvath@cox.net
Sent: Monday, June 15, 2015 11:06 AM
To: Sibbet, David; Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark
Cc: Fitzpatrick, Lisa; Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill; bruce.bettyliska@gmail.com; douglas.dill@att.net; efhgtc@gmail.com
Subject: VALIANO SPECIFIC PLAN; PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-

VALIANO SPECIFIC PLAN; PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ- 13-001, PDS2013-TM-5575, PDS2013-STP-13-003, PDS2014-MUP-14-019, HLP XX-XXX, LOG NO. PDS2013-ER-13-08-002; SCH NO. 2013061042.

Dear Ms. Ehsan:

Thank you for the opportunity to comment on the Valiano project, and for the work that you and your colleagues have put into this project. My name is Janet Horvath and I have lived at 2811 Eden Valley Lane, Escondido, CA 92029 in the Eden Valley community for 23 years.

I moved to Eden Valley Lane in 1992 when the street was still a dirt road. My house is the second house on the left from Country Club Drive. I believe it was in the early 2000's when neighbors on Eden Valley started talking about paving the road and the various options for doing so. I thought Eden Valley Lane was a private road, so I was completely surprised to hear that Eden Valley Lane is now named as the primary entrance/exit to the Valiano project. I don't understand what and how this happened. Moreover, if I had any inkling that a development project could just come in and hijack my road, I would never have approved of the road being paved in the first place. It is devastating to the rural nature of the community. I have owls that live in my trees and I can listen to them call back and forth to each other. Flocks of mallard ducks, tree frogs, egrets and all kinds of birds frequent my property and have nests in my bushes and trees (woodpeckers, humming birds, sparrows, mockingbirds, a yellow-winged bird and crows). It is dark, quiet and beautifully rural.

Here are a couple other concerns:

1-I am 64 years old, live by myself, maintain my own property, have multiple vehicles and at various times have multiple animals. During the evacuation of last years (2014) Cocos wild fires (also happened in 2007), I rely on family to drive in/out to help me move my vehicles and belongings. In 2007, my daughter was not allowed into the area with her car and she ran 1/3 mile in to help me and my animals get out. In 2014, we made multiple trips to get some of my "stuff" out. Adding more people to my street is going to slow everything down...and, I pray that you have looked at the egress of people to get out of the area. We now have Harmony Grove Village open and I'm sure that will add tons of traffic to Country Club Drive during emergencies. It's scary because I saw what happened last year, when my neighbors had trailers coming in to help get their animals out. There was a lot of traffic....and, you can't wait until the last minute to get folks/animals out.

This is not just a matter of the number of units, but the number of vehicles and people. Will I still be able to back out of my driveway into the street? How much of my property will be lost? And speaking of units, I need to learn more about "second" dwelling units and how that increases the impact. What is the speed going to be on this stretch of road?

What's going to happen to the dip in the road over the creek, which is about 40 feet from Country Club?

I also read in the EIR (Pg.6-1) that there would be a new "12inch main" to Eden Valley Lane. Does this mean the street gets dug up, that we need to move to sewers instead of septic? What's the impact on those of us 'downstream'.

2-Wind pattern changes? Right now, I get a breeze from the west across my property. Historically, there were times when we had 'egg ranch' smell in our valley too (now Harmony Grove Village). How will the density of homes being proposed by Valiano impact the air flow and air quality? It will get mighty hot in the valley without air flow. Plus, will there be an odor from a water treatment plant above me? Both are big impacts. I thought septic tanks were required in our area. I have drove by the water treatment plant near Del Diablo and it can be an awful smell.

3-Traffic is already horrible, trying to get across Mission and across 78 at Nordahl. So, is Auto Parkway (Citracado) at Country Club, especially during rush hour. I already go out of my way to avoid that area. The traffic through the industrial park is also going to increase as people try to find short cuts to avoid the Mission/Nordahl congestion. This is scary if ever a wild fire or disaster requiring people to get out fast.

4)Will there be blasting in the area to get through the granite in the ground? How much? How long? This noise pollution not only impacts humans, but also the wildlife in the area.

I have not examined the entire EIR yet, but I hope that some of the items I have mentioned here are considered in the decisions for the Valiano project. I am not against development, but I think it should follow the parameters of what this community has worked so hard to develop. Please protect those of us who live here!

Respectfully and thank you for your consideration!

Janet L. Horvath
2811 Eden Valley Lane
Escondido, CA 92029
760-519-6054

Ehsan, Beth

From: Heidi Huffman <heidiflies@yahoo.com>
Sent: Monday, June 15, 2015 1:04 PM
To: Ehsan, Beth
Subject: Re: Valiano DEIR comments

Hello Beth,

Yes, it is HGVillage.

Yes I want the pictures, etc saved as public comment re Valiano EIR and the water use.

Thank you,
Heidi Huffman

Sent from my iPhone

> On Jun 15, 2015, at 11:51, Ehsan, Beth <Beth.Ehsan@sdcounty.ca.gov> wrote:

>

> Hello Heidi,

> Do these photos and the video that you sent show Harmony Grove

> Village? Do you want the photos and your emails saved as public

> comments on the EIR? (I can save the video too but there's no way to

> print out a video for the file.) Thanks, Beth

>

> Beth Ehsan

> Planning & Development Services

> 858-694-3103

>

>

> -----Original Message-----

> From: Heidi Huffman [<mailto:heidiflies@yahoo.com>]

> Sent: Sunday, June 14, 2015 1:48 PM

> To: Ehsan, Beth

> Subject: Valiano DEIR comments

>

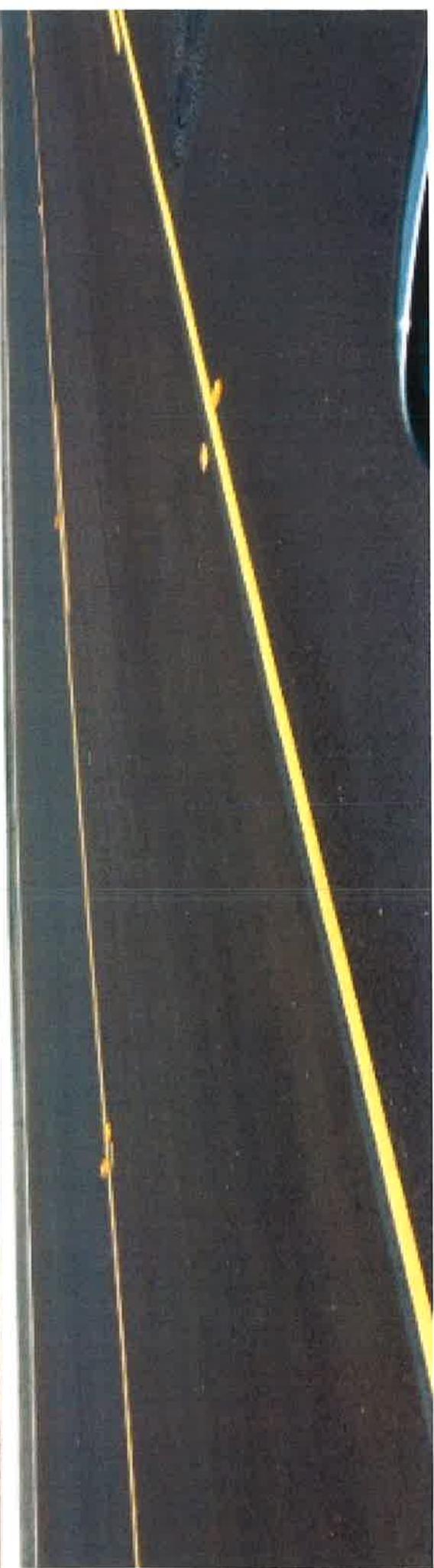
> Madam,

> Note the vast piping involved with watering the common area ornamental hillsides.

> Thank you,

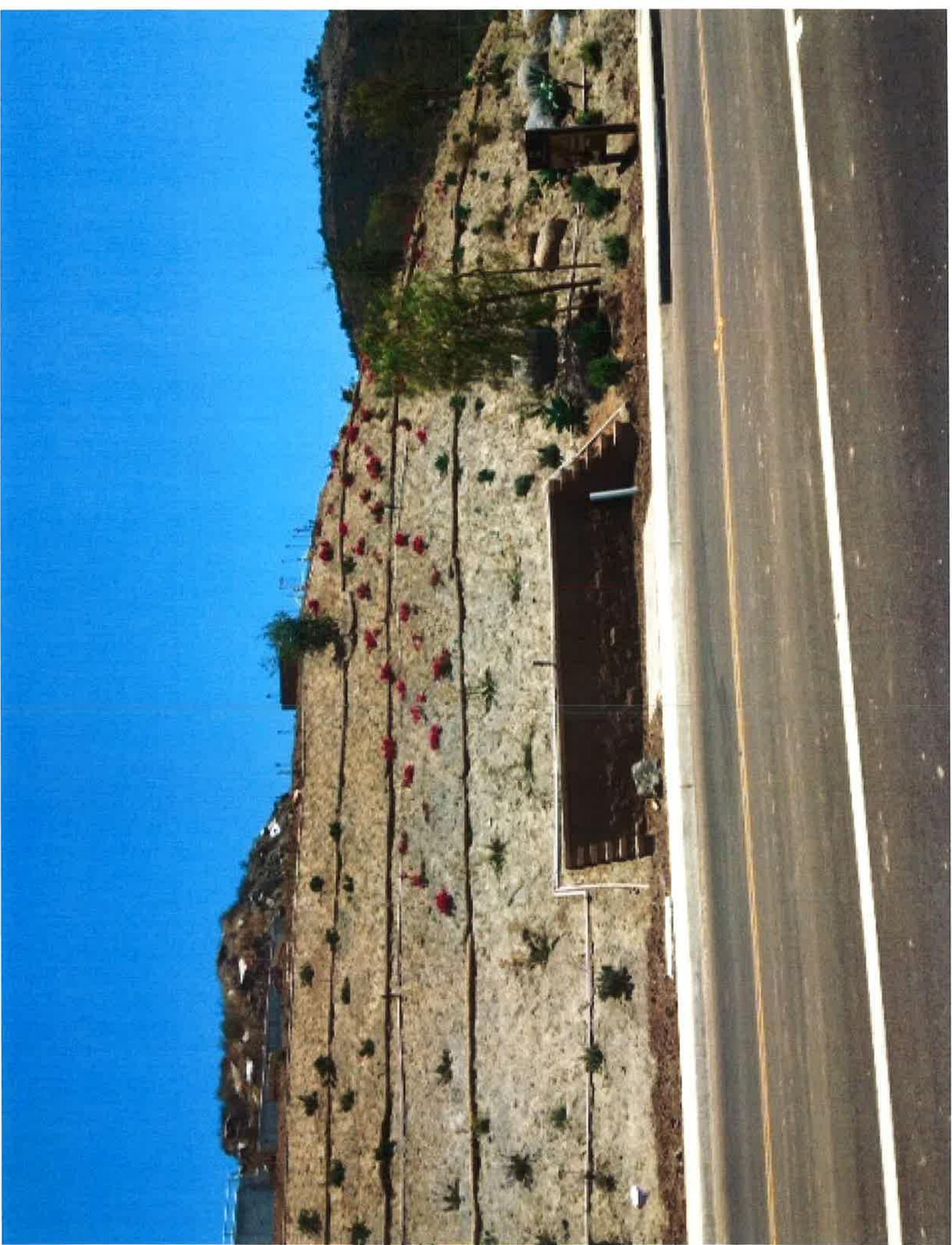
> Heidi Huffman

>









Ehsan, Beth

From: Heidi Huffman <heidiflies@yahoo.com>
Sent: Sunday, June 14, 2015 1:46 PM
To: Ehsan, Beth
Subject: Re: Valiano DEIR comments
Attachments: IMG_2917.MOV; ATT00001.txt

Dear Madam,

I was not able to video the common area hillsides, but I did video tape the big grassy field being watered. Please note all the water evaporating. Do we really need more communities like this, that waste our precious resource?

Sincerely,

Heidi Huffman

Dear Madam,

June 6, 2015

“State Water Board Adopts 25 Percent Mandatory Water Conservation Regulation

For Immediate Release Contact: George Kostyrko

May 5, 2015 gkostyrko@waterboards.ca.gov

SACRAMENTO – With emergency drought conditions persisting throughout California, the State Water Resources Control Board Tuesday adopted an emergency regulation requiring an immediate 25 percent reduction in overall potable urban water use statewide in accordance with Gov. Jerry Brown’s April 1 Executive Order.

The Governor’s Executive Order required, for the first time in the state’s history, mandatory conservation for all residents and directed several state agencies, including the State Water Board, to take immediate action to safeguard the state’s remaining potable urban water supplies in preparation for a possible fifth year of drought.”

Another 360 homes in Escondido (Valiano) does not conform to the above mandated restrictions. Actually, it does quite the opposite.

I drove by Harmony Grove Estates (742 homes) and dozens of enormous sprinklers were attempting to spray a hillside; 90+% of the water was evaporating into the air. I will go back over and take a video to show the neglectful waste of our precious resource. I will send it to you and post it on Youtube.

As Escondido homeowners, my husband and I are taking this regulation seriously. We removed our back lawn, had 3 thirsty redwoods removed, and are planning to remove our front lawn to replace it with gravel and drought tolerant plants.

On a smaller note, we have installed pumps in our shower and kitchen faucets to heat up the water so we do not have to run it to get hot water, we turn the water off in the shower while we shampoo and wash, we only run full loads of laundry and dishes, we use runoff water from rinsing fruit and vegetables in the kitchen to water our outdoor plants, etc. Is this all futile? We are taking the restrictions seriously.

Valiano claims they will use reclaimed water to water the common areas.

Why, in a **severe** drought, would the common areas even require water?

How about rocks and California natives/drought tolerant plants like the rest of us are doing?

The proposed sewage treatment plant will be the 3rd within a mile radius of our home. We had planned to retire here, but we will not live out our golden years downwind of someone else's excreta.

Traffic. The major intersections in our area (Mission and Auto Parkway/Nordahl, Valley Parkway and 9th, Nordahl and Montiel, etc) are **currently** logjam nightmares. Adding 1,000s of new cars to this equation will result in unlivable conditions. All the roads in and out of the area are 2 lane roads, not suitable nor safe for this amount of traffic. North Country Club Road is getting 100s of new homes on the golf course; these cars will ALSO add to the congestion of these intersections, not to mention the freeways. This ALL must be taken into account.

On the topic of safety, we evacuated during the Cocos Fire when we received the reverse 911 call. Traffic came to a complete halt at 9th and Valley Parkway. Some Harmony Grove residents took over 2 hours to evacuate as the fire was raging in their back yards. Add the number of cars that these developments will bring to the evacuation scramble, on two lane roads, and Escondido may find itself held liable for loss of life due to the inability to escape fire. I do not want my tax dollars spent fighting the lawsuits that this would bring.

To summarize, we feel that by even entertaining the thought of this many NEW homes is a slap in the face to water conservation and so called "smart growth".

The Valiano project does not make sense with regards to our precious natural resource, (water), congestion, nor safety.

Thank you for your time and consideration.

Sincerely,

Heidi R. Huffman
2759 Canyon Oak Place
Escondido, CA 92029
760-877-8274
heidiflies@yahoo.com

Dear Madam,

June 6, 2015

When you vote on the proposal to build the "Valiano" community project, please consider my objection. I have been a resident of Escondido living in the Hidden Hills development for the past eight years. The boundary of the development is Country Club Drive and Kauana Loa Drive connecting to Harmony Grove Road. All are two lane roads.

My concern for development is the lack of roads for egress in case of fire. I have seen our neighborhood evacuated twice for wild fires. The last one was the Cocos fire in May of 2014. At that time we were properly prepared to evacuate. Our neighborhood waited anxiously. The firefighters established control of the fire. All looked well. Those who had already vacated returned. The following day the wind shifted. Very quickly the fire was an extreme threat. Our neighborhood got the call to leave and all residents evacuated at once. Fire had reached Country Club Drive. Harmony Grove Road was the only way out and was immediately at capacity.

I fear that with the additional homes proposed, evacuation in a similar circumstance will not occur smoothly. Even with the new bridge to access Citracado Parkway I do not see how the population of an additional 350+ (1500+ with Harmony Grove Estates, etc) homes in the area could possibly evacuate in the time that I observed the advance of the fire.

In the litigious society we live in I fear the city of Escondido will be held liable for the decision to build without the infrastructure of roads to egress a known fire hazard. Fighting those lawsuits and paying for damages is not where I want to see my tax dollars spent.

Thank you for your time.

William T. Huffman
2759 Canyon Oak Pl.
Escondido CA., 92029

Ehsan, Beth

From: Linda Roppe <roppe@earthlink.net>
Sent: Sunday, May 31, 2015 8:09 PM
To: Ehsan, Beth
Subject: Valiant Project

Dear Members,

Kindly consider concerns of residents of Hidden Hills/Citricado/Eden Valley residents of Escondido.

My husband and I have lived in Hidden Hills for eleven years. Our home directly overlooks Country Club Drive. This is a two lane road, traveled by traffic in both directions past homes and horse corrals. Currently the traffic level is at capacity as industrial trucks and consumer vehicles travel to work and shopping destinations.

Today marked the opening of Harmony Grove Village. 750 homes are being compacted side by side with no back or front yards into this once open beautiful space. We estimate that this will add 3,000 people to the nearby area. The egress roads will be Country Club Drive and Harmony Grove Road as these people travel to work, the Albertson/Home Depot Shopping Center and Costco/Walmart Centers nearby. These two small streets will be the only way to the 78 and 15 freeways.

It is absurd to compound the situation with the further addition of the Valiant Project. Not only will more homes and sewage treatment facilities, impact the environment and traffic pattern but also further disrupt the natural habitat of animals and vegetation, not to mention the view of Mt. Whitney.

Please consider our concerns and pleas to block this unnecessary and disruptive project. Thank you for respecting the views and opinions of our neighborhoods.

I am available for further comment or input at roppe@earthlink.net and Linda Roppe', 2795 Canyon Oak Road, Escondido, Ca. 92029

June 15, 2015

Ms. Beth Ehsan
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Beth.Ehsan@sdcounty.ca.gov

CC: Dave Sibbets: David.Sibbet@sdcounty.ca.gov
Maggie Loy: Maggie.Loy@sdcounty.ca.gov
Kristin Blackson: Kristin.Blackson@sdcounty.ca.gov
Mark Wardlaw: Mark.Wardlaw@sdcounty.ca.gov

Re: Valiano Specific Plan, SCH NO. 2013061042—Public Comments on Draft Environmental Impact Report

Ms. Ehsan and County of San Diego Planning & Development Services Staff,

Thank you for giving us an opportunity to comment on the DEIR request for a 380-Unit residential subdivision (326 + 54 2nd dwellings = 380) referred to as Valiano. We live at 1023 Country Club Drive in Eden Valley. Our home abuts Neighborhood 3 (APN 232-492-01), and is two lots east of Neighborhood 4 (APN 232-113-01 & 02), and our view extends south to a large portion of Neighborhood 2 (APN 232-113-01). We have lived here for over 14 years. We know you will be receiving detailed reviews of the DEIR from several community groups, including ours (Friends Of Eden Valley) and the EFHG Town Council's combined efforts. We concur with these community groups' findings of gross deficiencies and omissions in nearly every section of the DEIR, and will instead ATTEMPT to concentrate our comments from a more person impact stance.

When my husband retired from the US Marine Corps, we searched for our retirement home in an area which includes horses. The Animal Zoning was one of the major criteria we based our home searches on. With the Valiano project as currently proposed, the conversion of currently predominately vacant land in our valley to urbanized uses (paved roadways, graded lots with buildings, etc.) represents an irreversible loss of existing Equestrian capable lands. These losses are incompatible with the current residents Community Character and Existing uses. In a situation where the urban area encroaches on the rural areas, incompatible issues arise such as farm noises, smells, and sounds. Ultimately, the rural voices are always chased away. This is not addressed in the DEIR.



We ask that the following mitigation be required of the applicant:

- Enlarge the number of lots to properly accommodate horse keeping on the majority of the project by reducing the number of allowed lots to the existing general plan, and eliminating the 54 second dwellings.
- Change the name to **Valiano Ranch** to better reflect the Equestrian lifestyle, both on-site and off-site.

Project Alternative:

The DEIR fails to analyze a realistic alternative project, on or off-site. A plan that follows the current General Plan has markedly less impacts. Utilizing the GP zoning and existing community plan could reduce land use impacts, and would eliminate much of the widespread opposition from the local residents and other groups. As an alternative project, provided greater analysis using the current maximum number of dwellings possible under the current General Plan, with the lots designated for Horse Keeping.

A revised EIR must evaluate a version more in line with the existing community character OR relocation of the project to an area within the City of San Marcos or the City of Escondido where this type of project would be acceptable and possibly even welcomed.

Landform/Aesthetics:

The amount of landform modification for the proposed hillside lots on of the subdivision should be reduced due to the large amounts of granite base. Properties directly to the west of the project are designated as very-low residential with large animal keeping. The proposed hillside lots on the western portion of the subdivision are much smaller in size, and do not provide an adequate transition in lot size from very-low density in the west, to higher density to the east. In addition, the proposed lot sizes bordering existing homes are not consistent with other planned residential developments within the area. A revised EIR must evaluate a version more in line with the existing community character.

Noise

The DEIR appears to review noise primarily from the traffic standpoint. Further review of the project does not address the added noise that will be produced once the conversion occurs of currently predominately vacant land in our valley to build out for urbanized uses (paved roadways, graded lots with buildings, etc.). These need to be addressed.

M-N-9: *Any livestock showing distress from blasting activity AT ANY DISTANCE...* This is the most unrealistic thing ever! With Coronado Hills to the West, and Hidden Hills to the East, Eden Valley is the valley floor with a "bowl-like" topography in which sound travels and echos much further than the allotted distances of 300 or 600 feet. There are approximately 164 horses in Eden Valley.

- A more realistic alternative to moving the horses each day prior to blasting must be analyzed in greater detail. Horse naturally have better hearing and greater instinctual "fear flight" reactions that humans. The stress of blasting, or moving to an alternate location sets these animals up for higher risk of injury, risk of Ulcers, and/or risk Colic which can ultimately result in death. Horses are not like dogs and do not adapt to new situations quickly.

Traffic

As Country Club Drive will have a substantial cumulative increase in traffic due to this project, a sight distance study should be prepared for the intersections of ALL existing off-site private road easement used by 3 or more homes. Applicant should be held responsible for creating proper line of sight for all applicable off-site private road easements for health and safety reasons.

There does not appear to be a report addressing project construction traffic impacts. The short term impacts of constructing the project with roads which are posted Traffic Calming area, as well as posted Equestrian usages needs to be addressed. Low speed limits and limited construction traffic hours would be favorable.

The Sprinter rail line at Nordahl/Auto Parkway intersection presently causes major impacts and back-ups in traffic far past the light at Country Club Drive. The Sprinter is due to "double track" in the near future which will make these impact even worse. This area was not included in the traffic analysis, yet it is key for both Commuter Traffic and during a Fire Evacuation for the project area. The area needs to be analyzed in great detail.

During construction AND completion of the project, the adequacy of the existing roads to accommodate the evacuation of the area during both a fire and a Wild Fire Storm situation was not addressed in this report. The recent Coco's Fire (May 2014) which covered approximately 90% of the proposed project site identified multiple problems evacuating area. This needs to be analyzed in great detail, and a plan needs to be prepared and approved prior to the approval of the project.

Fire

As noted in the Valiano FFP, "as the density of structures and the number of residents in the interface increases, potential ignition sources will multiply and a large wildfire occurrence increases". Allowing 20 lots to fall below the 150-foot defensible space requirement (7.2.10 - #4) from the San Marcos Fire Department put the existing residents as well as the future residents at server fire risk. Making larger lots in the affected area with the proper 150-foot defensible space would eliminate this issue.

It appears that the Fuel Modification Zone in several areas actually overlaps the required buffer for wetlands and other bio RPOs. Impact of reducing either RPO buffer and/or FMZ need to be fully analyzed in a revised EIR since either fire safety or bio resources would be compromised if the zones are one in the same or encroach on each other. These need to be better define.

The DEIR states there have been no fires in the past 50 in this area. I know this has been commented on by SEVERAL different agencies...so I'm not even going to touch this one!



1023 Country Club Drive (May 2014)



2820 Whitney Road (May 2014)

Air Quality

Unlike many typical “urban” communities, a large portion of the existing rural community residents work outdoor on their land daily. The substantial pollutant concentrations during construction will have adverse effects on the many horses, as well as the outdoor workers directly. This need to be analyzed and addressed in more detail.

The cumulative impact of project construction emissions needs to be evaluated and addressed in the context of other construction projects in the area. Additionally, the overlap between construction and operational emissions needs to be accounted for as well.

The proposed project would result in a significant decline in air quality in Eden Valley which would be harmful to residents as a whole. The topography of Eden Valley frequently creates its own unique inversion layers. As stated in the DEIR (subchapter 2.2): *“Temperature inversions prevent air close to the ground from mixing with the air about it. As a result, air pollutants are trapped near the ground”*. While the applicant acknowledges in section 2.2 that *“In addition the proposed project would significantly contribute to cumulative construction and operational air quality impacts (Impacts AQ-2 and AQ-3)...short of reducing the project size, there are no feasible mitigation measure to reduce the project’s contribution to the less than considerable levels”*.

- We ask that the following mitigation be required of the applicant:
Reduce the construction air quality impacts by reducing the number of homes (as admitted by the applicant as a feasible mitigation measure) to no more than the number allowed under the general plan, and eliminating the 54 second dwelling units.

Biological Resources

The project states that over 50% of the site be preserved as Open Space. Please define what kind of open space this refers to, as much of the designated “open space” is within the backyards of the proposed lots. What are the proposed setback variances that should be put in place to avoid encroachment of proposed homeowners who may feel that they “own” their land and can do with it as they see fit.

The biological open spaces are small and isolated. The project site contains multiple unique topographies, ecosystems and natural characteristics of our County. We believe these are fragile, irreplaceable resources that are vital to the general welfare of all residents. The proposed projects maps appear to isolate areas of biological importance and do not provide any wildlife corridors for movement throughout these areas. This will have a major impact on the animal life and potentially create an increase road kill rate as animals move between the biological areas. This could also potentially increase human/wildlife contact. Currently there is natural wildlife movement from the West on APN 232-013-02, down into the CA Oak preserve area on APN 232-492-01. The current proposal cuts this wildlife linkage off with proposed homes and a road, isolating the prime wetland feeding area.

- In an effort to preserve the natural wildlife corridor, consider extending Street 3A to meet with Street A, at or about the same intersection as Street 4A. Street 3B could be eliminated below Street 3D through the CA Oak area. As much of the lots #119, 120, 121 and 122 appear to fall into the RPO zone in addition to not meeting the 150-foot defensible space required by the SMFD, they should be removed from the plan. Additionally, eliminating Lots 205 – 209 would then keep the existing East/West wildlife linkage open.

Throughout the project there are many area specified with RPO setbacks. These setbacks are established to protect the oak riparian wetland areas, yet within the RPO setbacks there appears to be within multiple project lots, roads and grading areas. Where oak woodland occurs adjacent to the wetland, the wetland buffer shall include the entirety of the oak habitat. The proposed development pattern must be reevaluated for impacts to the RPO setbacks and FMZ setbacks as they often appear to be one-in-the same on the DEIR. The area needs to be analyzed in great detail.

Within neighborhood 3, the current RPO setback line does not appear to include all of the area that is under mitigation order for previous impacts by the former owner. Please clearly define the entire area that is included under mitigation order, along with associated RPO setbacks and fuel management easements. Within the Oak Riparian Wetland area of neighborhood 3 (APN 232-492-01), there is County mandate to the previous property owner in place, which indicates that onsite re-vegetation and enhancement is to be conducted. This in not mentioned in the DEIR and the applicant must ensure the proposed re-vegetation and enhancement takes place, but it should NOT be used toward the mitigation requirements for this project, as it is a pre-existing condition of that parcel. This was omitted from the DEIR and must be reviewed and a procedure put in place to ensure this happens.

Geology and Soils

As noted in the DEIR, there is the presence of soils with moderate or severe erodibility ratings. This will have both on-site and off-site impacts to proposed and existing residences. The existing private dirt easement on the North side of neighborhood 3 is a low point in that part of the Valley, and even with the slightest rain, soils washes away needing continual maintenance to keep the dirt easement passable for existing residents. Excess water from the wetland area in proposed neighborhood 3 is know to drain onto this off-site easement.

There is a very high water table in Eden Valley. The DEIR failed to mention that previous moderate to heavy rains have resulted in soils liquefying on the existing access road north of proposed neighborhood 3. You could literally see the ground move like a slow wave under foot, and numerous large service vehicles have sunk into the road.



It appears that a large portion of the proposed homes will be elevated, changing the current topography and drainage of the greater area. This condition needs to be analyzed in greater detail.

Other Project Component Parts

- In Chapter 1, page 1-5, the review states that the 0.2 acre site will be reconfigured to allow a horse facility with trailer parking, an exercise ring and accommodate private horse boarding. How is this possible on only a 0.2 acre site? This needs to be corrected.

- There is no mention of a MUP that would be necessary to run the proposed Private Equestrian Facility. According to County Standards, if any permitted land is not used for 1 full year, then that permit is no longer valid. The Harmony Grove Equestrian Center has sat vacant for well over 1 year. The applicant must now apply for the proper MUP or other applicable permit per the County Equestrian Ordinance.
- Per the County Trails Map, the applicant is required to make the trail connections with the other regional trails. This is not apparent in the report. To the South, the trails must connect with the Harmony Grove Village trails. To the North, the trails must go through ALL of the proposed project parcel including APN 232-013-01 with the intent to connect with Jack's Pond in San Marcos. There will be a dedicated Ag easement on that parcel which should incorporate the Trail linkage. To the east, it is unclear where the trails will connect. It appears that trail in Neighborhood 3 connects to a private easement. There does not appear to be other locations where the existing residents can access the trail system at points throughout the project. This needs to be addressed.
- The DEIR repeatedly uses the 326 number in the analysis sections which understates potential impacts. The Project would allow a certain number (54) of secondary units and should clearly state that true number is 380.
- The amount of landform modification for the proposed hillside lots on of the subdivision should be reduced due to the large amounts of granite base.

To address these components, we ask that the following mitigation be required of the applicant:

- Enlarge the number of lots to properly accommodate horse keeping on the majority of the project by reducing the number of allowed lots to the existing general plan, and eliminating the 54 second dwellings.
- Change the name to **Valiano Ranch** to better reflect the Equestrian lifestyle, both on-site and off-site.

In conclusion, we realize that there is continual pressure to put higher density residential in this area beyond what is allowed by the General Plan Land Use Map. Our area residents will continue to work TOGETHER AS A COMMUNITY to preserve this historic 100+ year-old area by implementing the Village Development Pattern that was negotiated with County Staff and approved by the BOS in August 2011.

We are not opposed to development in our area that is consistent with the existing General Plan. However, development is not supported if the proposed project:

- Would involve a significantly higher density than the approved General Plan
- Would result in the loss of substantial Equestrian capable lands
- Does not seek to embrace and preserve the Equestrian nature of the surrounding area
- Would be a significant impact and is incompatible with the existing rural community character and existing uses.

Sincerely,
Janean & William Huston
1023 Country Club Drive
Escondido, CA 92029
858-735-0550

Ehsan, Beth

From: Larry Jansen <ljansen@ninyoandmoore.com>
Sent: Monday, June 15, 2015 1:29 PM
To: Ehsan, Beth; Sibbet, David; Loy, Maggie A; Kristen.Blackson@sdcounty.ca.gov; Wardlaw, Mark; Fitzpatrick, Lisa; Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill; efhgtc@gmail.com
Cc: jansen5@sbcglobal.net
Subject: Valiano Draft Environmental Impact Report

Dear County of San Diego planning and development services:

I am writing to express concern regarding the planned Valiano development proposed for the Eden Valley area of San Diego County. My wife and I live at 19995 Elfin Forest Road in the unincorporated area of Elfin Forest, San Diego County. We have lived here approximately 12 years. We made an investment in the Elfin Forest area for a quality of life that is defined by low density housing, open space areas and a rural setting. Our decision to re-locate here was also based on our understanding of development limitations outlined in the County General Plan for the area, which sets restrictions on the density of housing.

We are not against land development and we believe that a land owner has the right to develop property within the guidelines of the County General Plan. Based on our review of the Draft Environmental Impact Report for the project, it is evident that the developer of this project proposes to increase the density of houses 3 to 4 times what is allowed per the General Plan. This is not right and we urge all of the County representatives to uphold the density restrictions of the General Plan. Developers should not be allowed to bend the rules to suit their desires to increase profits.

The Valiano project is a few miles from our house, but it will have a direct impact on us. We already have noticed an increase in traffic from current construction activities in the Harmony Grove area and each new residence will add to this. Our concerns regarding this project include:

- Increase in traffic,
- Water consumption; why allow increases in density when we are in a drought with climate change upon us?,
- Fire safety; we have been evacuated twice and this project will increase the congestion during emergency evacuations,

The General Plan was prepared with careful consideration of the long-term impacts of development and to maintain the character of various neighborhoods. Please do your job to protect us, your constituents, and stick to the requirements of the existing General Plan. Do not let high density development proceed that will ruin our neighborhood forever.

Sincerely,

Lawrence and Michele Jansen
19995 Elfin Forest Road
San Diego County, California 92029

Ehsan, Beth

From: PAIGE JENNINGS <pjennings161@sbcglobal.net>
Sent: Wednesday, May 27, 2015 8:14 PM
To: Ehsan, Beth
Subject: Citizen Response to Proposed North County Development

May 27, 2015

Dear Ms.Ehsan,

As a San Diego native, and longtime Escondido resident and homeowner, I am very concerned about the potential development being planned on the Western side of our city, namely the Valiano project. I understand this is in ADDITION to the already approved Harmony Grove Estates with over 750 homes.

My first concern is our precious resource, **water**. Governor Brown recently implemented mandatory 25% water use cutbacks by each California city. What little water we have needs to be used for drinking, growing food, and fighting fires. I have long had a drought tolerant yard, and take the "severe drought" situation seriously. I feel the addition of the Valiano development to our community and the water use it will bring is not a logical step to take during a drought.

My second concern is **congestion**. While I reside in Old Escondido, the impact from these developments will be felt in all parts of the city (and county).

I feel we do not have the infrastructure, nor space for this many more folks in our community. Traffic is already insufferable much of the time, and we do not have the public transportation to support this kind of growth.

Thirdly, I have to wonder if the Valiano folks will be able to insure their homes from **fire**. The two lane roads in and out of Harmony Grove/Elfin Forrest appear to be a fire trap, especially during the panic situation of an evacuation. Fallbrook, CA is an excellent example of too narrow roads with firetrucks attempting to go in, and panicked citizenry attempted a retreat.

Thank you for your time and consideration.

Sincerely,

Paige Jennings
pjennings161@sbcglobal.net
161 E. 6th Street

Escondido, CA 92025

Ehsan, Beth

From: Natasha Kay <orangemoth13@gmail.com>
Sent: Tuesday, June 09, 2015 4:25 PM
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: Elfin Forest Harmony Grove Town Council
Subject: Valiano project

To whom it may concern,

I am writing today about the proposed EIR related to the Valiano Project in Eden Valley. We moved here in 2009 from Carlsbad. The reason I, and everyone else I've talked to moved here, is due to the rural atmosphere. We moved here to have quiet, dark night skies, privacy and to be in and around nature.

I am about a half mile around the corner from the Harmony Grove Village and I cannot express how much that project has negatively affected our lives and experience here. It has created noise, lights, more traffic and completely changed Harmony Grove for the worst, in more ways than I will mention here.

The reason for my letter today is to express my concern about the proposed Valiano project in Eden Valley. I read through parts of the EIR and it was strange to see that almost every topic brought up ended with a statement like: the "_____ impact would be less than significant". It was as if it had been written by them (Valiano). I think that almost everything in the report would have a very significant impact on this community. Everything from vector control, historical land uses, wildfire hazards and water have been mentioned and all of these cause us deep concern.

For us (my family here at 9237 Harmony Grove Road) the Valiano project will double the negative effects we are already suffering with from the HGV project. The traffic is already going to more than double and we fear that if Valiano is approved we may lose our homes due to having to widen the road. We are right on the road and see this as a reality. Being right on the main road we already have almost non-stop traffic day and night which again is only going to be worse once HGV fills up all those homes. With Valiano the traffic will increase even more. The issue of wildlife and open space is one of our largest concerns. Each pair of owls for instance, requires a certain amount of square acres to mate/breed, they will lose even more space. All of the animals will be losing space/habitat and some may die off altogether. When we moved here we had deers and coyotes frequently and now it is far less, Valiano will make this even worse. The dark sky policy is another issue that has been ruined by HGV, and again Valiano will worsen this as well. Water is now an issue for all of us and I just dont see how another 326 homes will be sustainable.

In conclusion I would just like to express my sadness and anger about the idea of another development down here in Harmony Grove when we havent even seen the affects of HGV. Another "project" (Valiano) will only exacerbate all of the issues we are now coming to terms with and learning to deal with.

Thank you for your consideration,
Natasha Kay (and family)

Monday, June 15, 2015

San Diego County Planning and Development Services
5510 Overland Ave., # 110
San Diego, CA 92123

RE: Valiano Project in Harmony Grove/Eden Valley

Dear Ms. Ehsan,

I'm writing to express my concern and opposition to the potential building of the Valiano Project in Harmony Grove and Eden Valley, which is adjacent to where we live in Elfin Forest.

I would first like to thank you and your colleagues for all the time and work you've put into reviewing the Valiano project. It means a great deal to our community and we all appreciate the due diligence you've given the planning for this project.

My husband and I have lived in Elfin Forest for 2 ½ wonderful years living at 20125 Colina Encantada Way, 92029. We built here knowing the close-knit community and rural lifestyle would be a wonderful match for us. Neighbors here look out for one another and when there's a disaster in the area as with the fires of May 2014, each person looks out for their neighbor. Though we don't have horses, horses abound in this area and we love them! I saw numerous vehicles pulling horse trailers looking for anyone who needed help with their animals. More than one drove up our short road to check to see that all animals were taken care of.

As you know, the project, as proposed, threatens to destroy the rural nature of our community and instead, assists in the urban sprawl that has taken over many parts of San Diego County. It also goes against the general plan that was agreed upon by the county many years ago. I know that numerous meetings were held to undertake this vast and daunting job, but in the end all parties agree that our community should take "our share of density" to accommodate the growth that San Diego County would experience over the next 20 years. A compromise was made and agreed upon. This project violates that Community Development Model creating a much higher density.

Which leads me to the roads. Elfin Forest and Harmony Grove Roads are mostly small, two lane roads and yet already have a high density of motor vehicles on them as it's a major east-west thoroughfare. The road was not intended for the traffic load that it now carries, not to mention an immensely increased load, which the Valiano Project would add to. People die on this road on a regular basis including a motorcycle accident this past April. The year before that, a head on crash occurred and killed another. Both within a ½ mile of our home.

There are many more issues that I could go on about but I will stop here. Please vote against this project as it stands. Thank you for your consideration.

Regards,

Kay Kolb

Ehsan, Beth

From: Alex Kohnke <mail@alexkohnke.com>
Sent: Monday, June 15, 2015 10:31 AM
To: Blackson, Kristin; Wardlaw, Mark; Loy, Maggie A; Ehsan, Beth; Sibbet, David
Cc: Fitzpatrick, Lisa; douglas.dill@att.net; bruce.bettyliska@gmail.com; Horn, Bill; Ron-Roberts; Roberts, Dave; Jacob, Dianne; Cox, Greg; efhgtc@gmail.com
Subject: Opposed to Valiano Development

Re:
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

Dear Ms. Ehsan:

Thank you and your colleagues at Planning and Development Services for all the hard work you've put into reviewing the Valiano project. It means a great deal to our community that you are giving it the due diligence it deserves. My name is Alexander Kohnke and I've lived on Elfin Forest Road in Elfin Forest for 1 year.

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 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:

I have moved my family here from Los Angeles, in search of a rural and natural place to live. A place where kids can grow up surrounded by nature and animals, where you can have horses and other animals, where there is open space and trails to explore, where the nights are dark and quiet and where you are able to see the stars at night. After a lot of research Elfin Forest was the place we felt would provide us with that opportunity. After reviewing the community plan it seemed like the right right place for us. We bought our house with the trust that the community plan would be upheld.

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. Tightly clustered houses, with 1000 foot walls, 20 feet high, manufactured slopes, street lights, fencing, gates and cul-de-sacs are NOT rural. Valiano has nothing to do with being rural other that it is destroying the very thing it is claiming to be. 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.

Thank you so much for your time!

Alexander Kohnke

20706 Elfin Forest Rd
Escondido, CA 92029

Ehsan, Beth

From: Daniel Kucharski <daniel.kucharski@gmail.com>
Sent: Sunday, June 14, 2015 8:25 PM
To: Sibbet, David; Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark
Cc: Fitzpatrick, Lisa; Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill; bruce.bettyliska@gmail.com; douglas.dill@att.net; efhgtc@gmail.com
Subject: Our concerns about Valiano project

Dear PDS representatives,

First, let me thank you for the opportunities you provided to us to voice our concerns about the Valiano project draft, and for the transparent manner in which this review process is being conducted. We have attended the meetings, and have expressed our concerns before, but decided it was important to be on the record.

My name is Daniel Kucharski, and together with my wife Joanna Kiljan we are Elfin Forest residents. We are writing this because of our concerns about Valiano project incompatibility with the character of our community, and the serious detrimental impact its new high-density variant will have on the enjoyment and value our community provides not only to its residents, but also numerous other stakeholders in San Diego County who frequently visit our community for recreational purposes. If the Valiano project is allowed to proceed, it will create a serious safety hazard.

When the subject of new development is discussed in Elfin Forest and Harmony Grove, equestrian issues are usually brought to the forefront. However, this is just one of many dimensions of the unique character of our community. Another important aspect is road cycling. Our community attracts literally hundreds of cyclist every week from all over San Diego County. This includes individual riders and small groups as well as organized club rides and charity events. Our area has rich cycling tradition. In fact, Tour of California—one of the largest professional cycling events in the US—sometimes passes through nearby Escondido, which further fuels participation in this already very popular sport. Community of Elfin Forest and Harmony Grove provides a unique cycling experience, with its undulating terrain accompanied by spectacular views of hills, rocks formations, and the vegetation supported by Escondido Creek. The ride is uninterrupted by traffic lights and intersections, and it benefits from mild coastal weather, and often a perceptible ocean breeze. No other place in San Diego County provides this combination of desirable qualities to cyclists.

Mountain bikers share our trails with equestrians and hikers under a well-defined set of trail conduct rules, but road cycling happens on the road, and this is where the problem lies. There is only one road connecting the new developments to western communities of San Elijo Hills, Carlsbad, and Encinitas. This road is Harmony Grove Rd, which becomes Elfin Forrest Rd, and with its one traffic lane in each direction, blind curves, and limited shoulder areas it is absolutely not equipped to sustain heavy traffic in a safe manner, particularly of the mixed type, involving both bicycles and cars. But the developer proposed no mitigation, and is not even acknowledging the inevitable traffic increase on these roads as project phases are completed. No evidence was provided to support their view.

The traffic has already increased since the start of Harmony Grove Village construction, which creates backups even with something as routine as Monday morning EDCO trash pickup, because there are few safe places to pass on Elfin Forest Rd and Harmony Grove Rd. My fairly recent conversation with a deputy from San Diego

County Sheriff's Department confirmed that the traffic conditions are indeed deteriorating. In his opinion, the traffic is already at a level that makes it unsafe for cyclist to use these roads. And if the Valiano project is allowed to proceed, it will only get worse.

California CVC 21760 (a.k.a. Three Feet for Safety Act) requires motor vehicles to leave a 3-foot margin while passing a cyclist. With the increased traffic, compliance with this law will simply not be possible on these roads without bike lanes, resulting either in cyclists being hit by cars, or head-on collisions between cars travelling in opposite directions.

In summary, we strongly believe the Valiano proposal should be rejected, or at least put on hold while a comprehensive traffic study is conducted by an independent party. To establish the baseline, this study needs to take in the account the increase in traffic that has already taken place since the construction started in Harmony Grove Village, and which is already impacting the safety of the residents and the visitors. Concrete mitigation steps also need to be proposed and funded. This will most likely require full, uninterrupted bike lane to be created on both sides of Harmony Grove Rd and Elfin Forest Rd between the new developments and San Elijo Rd.

Thank you in advance for taking the time to consider our concerns.

Daniel Kucharski & Joanna Kiljan
8080 Harmony Grove Rd
Elfin Forest, CA 92029