

Ehsan, Beth

From: Andy Laderman <aladerman@cox.net>
Sent: Monday, June 15, 2015 9:21 AM
To: Sibbet, David; Ehsan, Beth; Loy, Maggie A; Wardlaw, Mark
Cc: Fitzpatrick, Lisa; Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill; douglas.dill@att.net; Elfin Forest Harmony Grove Town Council; EdenValleyNews@aol.com
Subject: 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

County Planning and Development Services:

We live at 2710 Surrey Lane in Eden Valley. As residents of Eden Valley for over 30 years we appreciate the opportunity to comment on the draft EIR for the proposed Valiano project. We know you will be receiving detailed critiques of the draft EIR from several community groups. We concur with most of the community groups' findings of gross deficiencies and omissions in nearly every section of the draft EIR. We know that you will diligently review the input from these groups and hence do not feel it necessary to repeat their comments. Rather, we would like to use this opportunity to document the personal impacts that the project will have on our health, safety and quality of life if it is approved as proposed.

Increased Traffic and Impact on Ability to Evacuate

As residents who have lived in the area for many years we can attest to the fact that we live in an area susceptible to wildfires and have had to evacuate several times. Due to the topography of the valley, Country Club Drive, a two lane road, is the only evacuation route out of the valley. The road is currently rated a LOS (level of service) "A" where it passes in front of our parcel (Draft EIR table 2.8.3). Even with this low traffic volume, it was still chaotic with several traffic delays when all of Eden Valley with our horse trailers were evacuating during the Cocos fire. The draft EIR predicts that the LOS for this stretch of Country Club Drive will deteriorate to a LOS of "F", basically gridlock (Draft EIR table 2.8.7). Evacuating the residents and horses of Eden Valley and Valiano onto Country Club Drive would be impossible to achieve in a timely manner. A fast moving fire such as the Cocos fire would cause a catastrophe with the potential for significant loss of life. We do not want to be statistics in such a scenario. We would ask that the following mitigation be required of the applicant:

- Reduce the number of residents needing to evacuate in a wildfire by reducing the number of homes to no more than the number allowed under the existing general plan and eliminating the 54 second dwelling units
- Requiring the applicant to provide evacuation routes that do not all empty eastbound onto Country Club Drive e.g. proving a northbound or westbound evacuation route by connecting to La Moree Road

Noise

Table 2.6.3 on subsection 2.6 of the EIR (Noise) predicts that the exterior CNEL for receivers 12 and 13 (our specific parcel) will reach levels of 66.6 dBA due to increased traffic on Country Club Drive. For assessing noise impacts to sensitive residential land uses, the County standard is an exterior noise level (for usable outdoor space) of 60 CNEL or less for single-family homes. Therefore, if this project goes ahead our backyard, pool, outdoor kitchen and patio will not be useable according to County standards. The EIR does not propose any mitigation to alleviate this impact. We would ask that the following mitigation be required of the applicant:

- Reduce the additional daily trips and hence the traffic noise by reducing the number of homes to no more than the number allowed under the existing general plan and eliminating the 54 second dwelling units
- Reducing the traffic on Country Club Drive by providing another access point to Valiano that does not come off Country Club Drive e.g. connecting the northwest corner of the site to La Moree Road
- Building a sound barrier or wall to shield our outdoor space from the increased traffic noise on Country Club Drive

Air Quality

The project would result in a significant decline in air quality in Eden Valley that would be harmful to us as well as all other residents of Eden Valley. The topography of Eden Valley results in frequent inversion layers. As stated in the Draft EIR (subchapter 2.2):

“Temperature inversions prevent air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground”.

The construction and operation of the project as proposed, including the additional traffic, would result in a significant deterioration in air quality. This is acknowledged by the applicant in section 2.2 of the draft EIR:

“In addition, the Proposed Project would significantly contribute to cumulative construction and operational air quality impacts (Impacts AQ-2 and AQ-3, respectively). short of reducing the Project size, there are no feasible mitigation measures to reduce the Project’s contribution to a less than considerable level. Accordingly, these impacts would remain significant and unmitigated.”

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

- Reduce the construction air quality impact by reducing the number of homes to no more than the number allowed under the existing general plan and eliminating the 54 second dwelling units
- Reduce the construction air quality impact by preserving the natural topography of the site. This would reduce the amount of grading and blasting required to produce level lots for lawns, parks, retaining walls, etc.
- Reduce the operational air quality impact by reducing the number of homes to no more than the number allowed under the existing general plan and eliminating the 54 second dwelling units

Construction Blasting and Grading Noise Impact on Livestock

Like many of the residents of Eden Valley we keep horses on our property. The noise and ground vibration associated with grading and blasting can be very harmful to horses. They are “flight” animals. However, they will not be able to flee from the noise. Not only will this be traumatic to the animals but could result in injury during their attempt to flee. Many of my neighbors who live closer to Harmony Grove Village experienced significant issues with their animals during the grading and blasting for this project. The applicant has proposed a 12 foot temporary sound barrier as mitigation. The equestrian community feels this would be woefully inadequate. We agree. We would ask that the following mitigation be required of the applicant:

- Reduce the amount of grading and blasting required by reducing the number of homes to no more than allowed under the existing general plan
- Reduce the amount of grading and blasting required by preserving the natural topography of the site rather than cutting and filing to produce level lots

Incompatibility with County’s Strategic Plan for Fiscal Years 2014-2019

There has been a lot of discussion about how this project is incompatible with the County's general plan. The applicant's solution is to ask for a general plan amendment. We would like to address the project's incompatibility with the goals of the County's Strategic Plan for Fiscal years 2014-2019. If the project is allowed to proceed as proposed it will be in direct conflict with at least two of the initiatives contained within the County's Strategic Plan. Specifically:

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

Conclusion

In this email we have only touched on the most significant impacts of the project. There are a whole host of additional impacts including degraded visual aesthetics, loss of rural community character, increased light pollution, loss of habitat, etc.....the list could go on and on. The draft EIR confirms what we observed in our comments on the NOP for this project sent to the County on July 16, 2013 that this project would have a devastating impact on our environment and lifestyle. As we also stated in our NOP comments:

"Our community has worked diligently with the County over the last decade to evolve a General Plan that recognizes and preserves our rural lifestyle through well thought out land use planning and zoning. The intent was to avoid just the sort of environmental impacts that will occur if the applicant is granted a highly impactful General Plan Amendment to develop Valiano as proposed."

We feel that the draft EIR reinforces the concerns we expressed two years ago. Indeed, the health and safety impacts are potentially worse than we originally feared.

Sincerely,
Andrew & Phyllis Laderman
2710 Surrey Lane
Escondido, CA 92029

Ehsan, Beth

From: Keala Lawson <keala.lawson@cox.net>
Sent: Monday, June 15, 2015 7:30 AM
To: Sibbet, David; Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark
Cc: Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill

Dear County Officers,

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 Keala Shotwell and I've lived at 2903 Eden Valley Lane since 1998.

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 personally was on the community committee that met with new Urban West to help give feedback on the Harmony Grove Development. I felt as though the many years spent working to reduce the number of total homes and guide the project to support our way of life was enough to say that we, Harmony Grove neighbors, did our part to allow development. I was shocked to find we now have to battle ANOTHER development in our back yard. Although this developer, Valiano, has made no attempts to hear our feedback and concerns or work toward a community that fits with our general plan. Please do not make me forfeit more of my families' quality of life by allowing this development to proceed as they have planned.

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

The intersection of Country Club and Autopark Way (the main ingress and egress of the project) is already majorly congested. I have lived here through the many fire seasons. The impact of this congestion to evacuate the new Harmony Grove development AND Eden Valley AND Valiano will be catastrophic. I saw the congestion that occurred on Twin Oaks during the last fires in San Elijo. Many

friends actually turned around and went home after 2 hours in traffic trying to exit that neighborhood. Due to our valley inflow and outflow of traffic this would very likely occur here as well. 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.

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

Thank you for hearing my concerns,

Kevin Lawson and Keala Shotwell

2903 Eden Valley Lane

Escondido, CA 92029

Ehsan, Beth

From: JoAnne Lesser <joanne.lesser@att.net>
Sent: Monday, June 15, 2015 1:37 PM
To: Ehsan, Beth
Cc: Sibbet, David; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark; Fitzpatrick, Lisa; Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill
Subject: Draft - EIR - Valiano proposed project

Dear Ms. Ehsan:

The Planning and Development Services has expended much time and work in reviewing the Valiano project. It means a great deal to our community and we appreciate that you are giving it the DUE DILIGENCE it deserves.

My name is **Jo-Anne Lesser** and I've lived on Live Oak Road (Eden Valley) for 27 years.

The Valiano project, as you know, threatens to destroy the wonderful community we are part of and that has existed, undisturbed for over 125 years. We live in a unique and special place in San Diego County, the last of its kind west of the 15!!

I take this opportunity to provide my comments on the Draft EIR for this project with the expectation that the developer will seek to follow the vision of the General Plan and that of my community:

- **General Plan Update:** In the 2000s the County staff and many members of our community (upwards of 60 and over 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. **We agreed with this compromise.** This project VIOLATES that compromise and it VIOLATES the Community Development Model and creates higher density outside the village core after the "feathering out" has occurred.
- **Harmony Grove Village:** We worked with New Urban West over a period of several years to make sure the project fits in with the Community Development Model and our community plan previously noted with the County Staff. However, Valiano violates the WORD AND SPIRIT of our community plan and the compromise we made by clustering houses closely together in very high density clusters.
- **Community Plan:** 27 years ago I moved to this community because it was rural with rural zoning and a rural environment. This applicant claims it is a semi-rural development and claims to have rural themes. This is not true; the houses are tightly clustered together

with 1000 foot walls, 20 feet high with manufactured slopes, gates, cul-de-sacs etc. What rural means to me is open fields, horse corrals, barns, ranch fencing. VALIANO'S PROPOSAL IS NOT RURAL.

- **Fire Safety:** During the CoCo's fire last year, we were stuck in traffic for over 45 minutes and we don't have horses. Country Club Road is only a two lane road with LOS F. It is facing evacuation traffic from 742 homes - with probably two cars per home. The FPP is focusing exclusively on the impacts to "the project" with no reference to how it will jeopardize the existing community.
- **Equestrian Example:** Horses on 1/3 of an acre?? I live in a development of 80+ homes - all with $\frac{1}{2}$ acre lots and NO ONE HAS A HORSE. Say no more.
- **Air Quality:** 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; they don't show that a project with fewer units is infeasible; they claim green credentials by exceeding the Title 24 standards from 2008, but newer standards are currently in plan from 2013. They do not meet the 2013 standards which are more stringent.

Ms. Ehsan, these are some of my top concerns about this proposed project; I expect that you will take these concerns into consideration when making your decision not to approve the plan as written.

Thank you for your attention to this communication.

Regards,

Jo-Anne Lesser

Ehsan, Beth

From: Norman Lesser <ndlesser@att.net>
Sent: Monday, June 15, 2015 1:53 PM
To: Ehsan, Beth; Sibbet, David; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark
Subject: Edan Valley Valiano Project

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 Norman Lesser and I've lived at 2462 Live Oak Road in Edan Valley for 28 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 am taking the opportunity to provide my comments on the Draft EIR for this project with the expectation that the developer will seek to follow the vision of the General Plan and that of the Community.

Community and Land Use

- **General Plan Update:** In the 2000s, the County staff and many members of our community (upwards of 60+ over many many meetings) collaborated on the General Plan Update and it was decided that our community should take "our share of density" to accommodate the growth that SD County would experience over the next 20 years. This is where the Community Development Model was implemented where our share of this density would form part of a denser village and then the density would feather outwards away from the village limit line, in order to protect the rural nature and the values of our community. *We agreed with this compromise.* This project violates that compromise and it violates the Community Development Model as it creates higher density outside the village core after the "feathering out" has occurred. This is significant.
- **Harmony Grove Village:** Then came New Urban West proposing a massive development **now selling homes.** We worked with them over several years to come up with a project that fits in with the Community Development Model and our community plan previously elaborated with County Staff. It fulfilled our obligation to accept our fair share of density and growth in San Diego County. HGV has maintained the Community Development model by keeping density in "the village" and feathering out with lower density the further you get away from the village. In fact, the lots to the north of HGV right next to Valiano's proposed area, are large lots (some as big as 10-20 acres), as are virtually every surrounding property to Valiano. The majority of the properties are 1 acre or more. So Valiano violates the word AND the spirit of our community plan and the compromise we made by clustering houses closely together in very high density clusters. To approve this increase in density would be a slap in the face to the community and suggest that creating a **General Plan** is a waste of time.
- **NC17:** This property had already received an up zone from SR2 to SR1. Then they came back in front of the BOS to ask for yet another up zone to SR0.5. This time, the BOS denied them for the reasons mentioned above: it violates the CDM, this community has already accepted its fair share and it violates the spirit of the agreement we made with county during the general plan process. Now, they are trying a third time to get an up zone. Nothing has changed on the ground since it was rejected the last time. The same logic applies and BOS should not approve this up zone for the same reasons as before.

Community Plan: Our community plan calls for a rural community with rural zoning and rural environment. With a community of higher density homes surrounded by home owners who

have farm animals there will be complaints of fowl odors, flies, obnoxious noise from roosters, geese, peacocks and other assorted farm animals. This is the nature of a rural community that new home owners do not think about until after they have purchased their home.

- **The Fire Protection Plan (FPP):** Makes no mention of evacuating horse trailers and how that would impact evacuation. 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. There is only one way out of that valley: Country Club Drive towards Auto Park way. If the fire comes west, like it did during Cocos there will be a massive traffic jam (LOS F means bumper to bumper traffic in non-evacuation circumstances) that could doom residents to a death trap. This is significant and not mitigated.
- The response times from San Marcos Fire District would be 7.5 minutes (above the 5 minutes standard). The DEIR assumes mutual aid from a fire station that hasn't been funded (at HGV) so that fire station cannot be used in the analysis. They are offering to pay into that fire station, but not Escondido Fire which will likely be the first responder. This is significant
- **Evacuation concerns:** Consideration that 80% of the new home owners will have more than one vehicle, during an evacuation, home owners will be taking as many vehicles as possible and will exacerbate the congestion as everyone is leaving.
- No analysis was made of the traffic heading West towards Elfin Forest Road. We know, from observation, that the traffic flow is more than 6% as stated in the DEIR. There is also a bottle neck at San Elijo Road.
- The intersection of Country Club and Auto Park Way (the main ingress and egress of the project) is already majorly congested. Even now, with HGV built out, we sometimes have to wait two light cycles just to turn left onto Auto Park Way. What's going to happen when all the houses from HGV and Valiano go in? This is an unacceptable, unmitigated impact.
- Furthermore, when the Sprinter comes by every 30 minutes (and soon, it will come every 15 minutes, according to NCT) it becomes even more congested. This impact is significant and unmitigated properly in the plan.

My wife and I have enjoyed living on Live Oak Road for the past 28 years, however, the thought that over 1000 new homes could be coming into our HOOD will change the whole feel that we have enjoyed. The general Plan was put in place for a reason. People are elected to protect the environment. Please think about the greater good on Eden Valley and the impact this development will have.

Thank you for viewing my concerns about this DEIR.

Respectfully,

Norman Lesser
ndlesser@att.net

Ehsan, Beth

From: Shellie Marshburn <ladybugs1810@yahoo.com>
Sent: Monday, June 15, 2015 12:40 PM
To: Ehsan, Beth
Subject: VALIANO PDS2013-SP-13-001

VALIANO PDS2013-SP-13-001

Dear Ms. Ehsan:

As a 31-year resident of Harmony Grove/Eden Valley, three of my top concerns related to the Valiano Project are: Water Shortage, the On-Site Water Treatment and Water Reclamation Facility (WTWRF), and the Fire Danger.

WATER SHORTAGE:

As I walked through Harmony Grove Village this morning, I observed many acres of newly-planted landscaping, all of which will require extensive, daily irrigation. In the current state of drought, this is a serious concern. In addition to the large water demands of each new household (many of whom are unaware/unwilling to install native landscapes), there will be numerous backyard pools, grass lawns, and many more acres of landscaped greenways. All of this will only add to the demands on our vastly limited water supply in San Diego County. I find it unconscionable that this expansion of population is even being considered while at the very same time the current residents are required to rigorously cut back water usage to accommodate the severe drought. Again, the very legislative bodies entrusted to guide the populace through the challenges of an inescapable drought are considering a proposal that is so obviously ill-advised and counterintuitive, given the state of the limited supply of water to San Diego County.

ON-SITE WATER TREATMENT AND WATER RECLAMATION FACILITY:

The proposed onsite Water Treatment and Water Reclamation Facility (WTWRF) is **unacceptable**. To think that in addition to permanently altering our rural lifestyle, those of us nearest the proposed WTWRF will have the *luxury* of being a neighbor to the processing of sewage from the new residents. To quote from the *Valiano Specific Plan, Page 6-11*, "Specific design measures will be required as conditions of the Wastewater Treatment and Water Reclamation Facility (WTWRF) Major Use Permit approval to **ensure that park users will not be affected by odors** caused by WTWRF operations." (emphasis mine) How thoughtful of the Valiano Project to voice concern over the potential park users' possible offense by the odors of the WTWRF, but no mention is made as to the adverse effects to the residents who will be exposed to the foul odors on a daily basis! As an up-wind neighbor of the WTWRF facility I cannot help but be concerned that my outdoors activities will be affected by the malodorous effects of the treatment of other people's sewage!! This is a most unpleasant and intolerable prospect. I would ask each of you if this would be an acceptable proposal for your own residence? I think not. As an avid gardener, I shudder to think what my outdoor activities would be like as I smell the wafting orders of processing sewage. I implore you to eliminate the possibility of the WTWRF and consider one of the other options.

FIRE DANGER:

Wild fires in San Diego County are a constant threat and the Harmony Grove/Eden Valley area has been particularly hard hit over the years. Three major wild fires have occurred in this area in addition to numerous less serious fires. The October 1996 fire that burned 8,600 acres and destroyed 120 homes began in the Harmony Grove/Eden Valley vicinity. In the 2007 Witch Creek Fire one of the many fronts of the wildfire came through the Lake Hodges area into the southern portion of Harmony Grove/Eden Valley, resulting in a mandatory evacuation of the residents. Most recently, the Cocos Fire of May 2014 also led to an even more extensive evacuation of our Valley. Mandatory fire evacuations are terrifying and chaotic. In this valley, there are two methods of ingress and egress and there are **NO PLANS** to expand or improve this situation even with the huge increase to the population. It is inconceivable to me to imagine the impossible situation a fire would pose with the number of homes proposed by the Valiano project. The homes would be built on the western portion of the valley which is the furthest from the major tributaries in and out of the valley, which will greatly exacerbate any evacuation effort. In a mandatory evacuation scenario, the resulting panic and chaos creates a real possibility of further danger and even loss of life. The sheer number of emergency vehicles, news vehicles, helicopters, water bombers, all coming into an area as compact as Harmony Grove/Eden Valley creates real obstructions to the evacuating residents; and in this case, many large vehicles with trailers evacuating horses and other livestock. **I've endured two mandatory evacuations** and the terror is real. San Diegans know the reality of loss of life from wildfires. It is incumbent upon our legislators to **ensure to every citizen of this County that safety is a top priority.**

In the 31 years I have been a resident of Harmony Grove/Eden Valley, I have witnessed the destruction of nearby native habitat through large development; i.e., Olivenhain, San Elijo Hills, and the current Harmony Grove Village. Once this native habitat is destroyed it cannot be replicated. The razed land is populated with private residences. UN-native habitats replace the chaparral and the wildlife is destroyed and lost forever. The once natural vistas are lost to urban sprawl. The proposed "gated community" is anathema to the low density, rural agricultural character of the valley. A "gated community" cannot be integrated into the current environment without totally disrupting the current atmosphere and rural texture. Please consider abiding by the current General Plan. Protect San Diego County's unique rural character.

Sincerely,

Shellie Marshburn
2738 Harmony Heights Road
Escondido, CA 92029
ladybugs1810@yahoo.com
760-641-3369

Ehsan, Beth

From: William Masuen <wmasuen@sbcglobal.net>
Sent: Monday, June 15, 2015 2:43 PM
To: Ehsan, Beth
Cc: Sibbet, David; 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; efhgtc@gmail.com
Subject: Valiano EIR

Dear Ms Ehsan:

Thank you for taking the time to review our many concerns regarding the Valiano EIR.

My name is William Masuen and I have lived at 1460 Romance Rd in Eden Valley for the past 20 years

Valiano has stated that there have been no fires in the area for 50 years. As you well know that is completely false. We have evacuated at least three times in recent years. Twice recently for the Cocos fire and on other occasions have had Cal Fire borate bombers dropping their loads at our rear fence line. The Cocos fire actually burned several feet inside our rear and side fence line. The fire burned part of the area where Valiano intends to build their high density POD houses. When the sheriff's office first told us to evacuate we had less than 30 minutes to get out and no fire was visible. Once the fire topped the hill the sheriff wanted us gone in five minutes. Fire engines had already entered the area and had backed into multiple residents driveways in order to keep the road clear for residents to get out. Due to the lay of the land smoke was hugging the ground and making it difficult to see to drive out. Smoke was so bad on Eden Valley we diverted to Calico and then Mount Whitney. Country Club was already clogged and numerous pickups with horse trailers were parked a mile away waiting to try to get past the police lines and help with evacuating their horses. We had to leave our livestock behind because there was no time to trailer them up and with the poor visibility and congested roadways we feared being trapped. The evacuation situation will become almost impossible with the addition of hundreds of additional homes trying to get out on roads that are already rated D and F rated . I am concerned for my safety and others if this project is approved at the densities proposed.

William Masuen

Ehsan, Beth

From: William Masuen <wmasuen@sbcglobal.net>
Sent: Monday, June 15, 2015 2:14 PM
To: Ehsan, Beth
Cc: Sibbet, David; 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; efhgtc@gmail.com
Subject: Valiano EIR.

Dear Ms Ehsan:

Thank you for taking the time to review our many concerns regarding the Valiano EIR.

My name is William Masuen and I have lived at 1460 Romance Rd in Eden Valley for the past 20 years

Fire Modification Zone - I object to Valiano using the last fifty feet of my property to fulfill their Fire Modification Zone requirements. I paid for this property and they have no right to tell me what I can do with it. My property is terraced into four levels. That lowest section of the lot is covered by a large oak tree and is a beautiful shady place to sit and get away from the pressures of the day. Valiano is already going to ruin the peaceful nature of that spot by putting their high density pod homes within feet of my fence. In rainy years that portion of the property is also frequently occupied by a naturally flowing creek. That creek will not flow directly into the rear of the POD homes being built in that depressed area of the landscape. I wonder what the homeowners will think about having a creek run through their house when it rains. In addition I occasionally let my livestock into that area to eat the naturally occurring grass since the water level is just below the surface and that area frequently stays green well into the summer months. I would anticipate that homes built in that lowest level in the entire area will have significant water problems whenever we have a year with heavy rains. Aren't there federal regulations about blocking a naturally occurring stream?

William Masuen

Ehsan, Beth

From: William Masuen <wmasuen@sbcglobal.net>
Sent: Monday, June 15, 2015 10:46 AM
To: Ehsan, Beth
Cc: Sibbet, David; 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; efhgtc@gmail.com
Subject: Valiano EIR

Dear Ms Ehsan:

Thank you for taking the time to review our many concerns regarding the Valiano EIR.

My name is Marilyn Masuen and I have lived at 1460 Romance Rd in Eden Valley for the past 20 years

Fuel Modification Zone - I strongly object to this designation being placed on my property. Neighborhood 1 is at my back fence line. If the developer needs land for a fire clearance it should start at the property line and go south into Neighborhood 1. Not only does this seem like an illegal taking of all the property along Romance Road this greatly decreases the value of the homes due to loss of use of the full acreage.

Density - The total project is not in compliance with the General Plan 2020. Neighborhood 1 has the highest density of homes in the entire project. Right now these homes are planned as closely grouped pod homes. This area of the project is the wrong place for these homes. The existing properties Neighborhood 1 backs onto all have livestock (horses & llamas). Since the developer wants the least amount of space between our homes and his pod homes, (thus taking our land for fuel modification) for the comfort of all concerned, new homeowners and present, the pod homes with small to no yards should be moved away from existing properties with livestock. Homes with horse lots would be a better placement in this area. The high density neighborhood could be placed west along the hills or in the middle of the project as in Harmony Grove Village.

Marilyn Masuen

Ehsan, Beth

From: William Masuen <wmasuen@sbcglobal.net>
Sent: Monday, June 15, 2015 1:39 PM
To: Ehsan, Beth
Cc: Sibbet, David; Blackson, Kristin; Wardlaw, Mark; 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 EIR

Dear Ms Ehsan:

Thank you for taking the time to review our many concerns regarding the Valiano EIR.

My name is William Masuen and I have lived at 1460 Romance Rd in Eden Valley for the past 20 years

When we first moved into the area Eden Valley road was a dirt road that during heavy rains was difficult to drive. Subsequently it was paved as part of the county Private Road Development. The cost to improve this road was added to our semi-annual taxes for all residents having property adjacent to Eden Valley road and four residents on Romance road. In addition, a road maintenance fee is also applied to our taxes each year. Whereas Valiano is planning on using Eden Valley Road as a primary entrance, the traffic and cost of maintenance on Eden Valley road will increase significantly. My understanding is that Valiano will not have any property adjacent to Eden Valley Road. How is the cost of maintaining this road going to be applied to the current residents who currently pay for maintaining this road?

William Masuen

Ehsan, Beth

From: Frauntene McLarney <frauntene@gmail.com>
Sent: Sunday, June 14, 2015 4:03 PM
To: Ehsan, Beth; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark; Sibbet, David
Cc: Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill; bruce.bettyliska@gmail.com; douglas.dill@att.net; efhgctc; Fitzpatrick, Lisa
Subject: Comments regarding 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 and Development Services Staff,

First, I want to thank you for presenting to our community regarding the Valiant project. The information and maps provided were helpful. Dave Sibbets has been especially helpful in providing guidance through this process. While this project is very upsetting to me on many levels, I have tried to keep my opinions and feelings in check.

The first issue I have questions about is the traffic study. As has been noted, there was no consideration of any traffic going West, to the communities of Encinitas, Carlsbad and parts of San Marcos. Elfin Forest Road/Harmony Grove Road is a well travelled country road between Escondido and the coast. For any residents of Harmony Grove Village, or residents of petitioned communities around HGV, this road will be used frequently to gain access to the coastal beach communities and Interstate 5 as the most direct path. The traffic study portion of this EIR must consider the impacts to this county road. Furthermore, at the opposite end of this road lies San Elijo Hills, a planned community that is still in the buildout phase, with several new neighborhoods and a new elementary school under construction. Impact to this community and it's intersections will also be affected as this is where Harmony Grove Rd/Elfin Forest Road dumps out. Currently, the intersections of Elfin Forest Road in San Elijo Hills are already very congested due to poor planning of another developer years ago. These intersections also need to be included in the traffic study with regards to traffic moving Westward.

Other issues which are equally disturbing with regards to the study are the evacuation implications in the event of a fire and also the fact that these studies are 3 years old or older. These issues have been brought up at length during the community meetings held in May and June.

I would also like to address the fact that the developer has stated that their plan keeps inline with the community feel and equestrian community due to the inclusion of an agriculture preserve and lots large enough for animal keeping. The lot sizes stated of 1/4 to 1/3 of an acre are hardly large enough for animal keeping, especially within a planned community where lot lines are plotted to make the maximum use of space for housing. My neighbor has horses which are a good 100 yards away from my house, yet at times, I can smell the horse manure like it was right outside my backdoor. The developers plans for animal keeping lots are only within our community plan IF residents chose to keep animals. The lots as their are designed are not conducive to animal keeping and will result in one of two outcomes, either residents will chose to keep animals in less than ideal conditions making for a disharmonious community among their neighbors or, those potential buyers with animal knowledge will choose to purchase somewhere else that is a logical choice for animal keeping. In the DEIR I did not see any stipulation that those larger lots HAD to be purchased with intent to keep animals. If those lots are purchased by buyers who are just looking for larger lots for manicured landscape, then the developers plan does not fit within our community culture. I feel it is necessary to have some sort of stipulation

requiring a certain amount of animal keeping or including lots that are actually large enough to house animals humanely and logically.

The other concern I have with the DEIR is regarding the loss of 'Farmlands of Local Importance and Unique Farmlands'. The applicant states on page 2.3-37 of the DEIR that preserving these unique growing regions would make this development not economically feasible, and also states that losing these lands are significant. Their mitigation attempts in creating the agricultural preserve within the community is not viable. While it may create a scenario that gets them off the hook, it still does not take into account the loss of prime farmland and the opportunity lost for creating small scale vineyards, orchards or other types of agricultural use that would be consistent with our Community Plan.

Having worked in agriculture for many years, I have seen first hand how maintaining a commercially viable agricultural crop does not coexist well with residential neighborhoods. I worked for the Paul Ecke Ranch for 10 years and watched as housing developments were put up around their property. Public concerns for our use of water, pesticides and fertilizers increased in relation to the number of houses surrounding the property. I feel this notion of having a productive agriculture preserve within a residential community is also ill-conceived. Residents might like it in theory, but once they see men in protective gear spraying pesticides, that will give way to concerns with public safety. In order for this preserve to mitigate any loss of Farmlands of Local Importance, I feel it necessary for the developer to provide evidence that these types of arrangements have succeeded elsewhere.

I am also concerned with the statement that the HOA will be tasked with managing the agricultural preserve. HOAs are not typically staffed with farmers or arborists and their main objective is to keep their community looking cohesive and well groomed to keep property values up. I can not see how a HOA will be capable of managing an agricultural crop, and once again, without proper design, community buy-in and oversight, there is no guarantee that this agriculture preserve within the Valiano community will survive. This part of the developers plan needs to have proper planning, funding, set-backs and oversight in order to ensure it's success in order for it to qualify to fit within our community plan.

Bottomline, while the developer has altered their plan somewhat in order to try and pay lip service to our community plan within the counties General Plan, their attempts fall way short of providing a viable solution. I would like to see the county hold them accountable to their claims that this is viable, as well as require an updated traffic study that examines ALL routes in and out of the community.

Thank you for your time and attention to these matters.

Frauntene McLarney, Chupacabra Farms
19928 Fortuna del Este
Elfin Forest, CA 92029
760-579-2993
frauntene@gmail.com

June 14, 2015

TO: San Diego County Planning and Development Services Staff

CC: San Diego County Board of Supervisors
San Diego County Planning Commission
San Dieguito Planning Group
Elfin Forest Town Council

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

Having attended several meetings related to the proposed Valiano project, as well as reviewed the Draft EIR, there is no shortage of issues and negative impacts that have been overlooked, mischaracterized, and/or understated by the developer and/or the EIR. Because others in our community have been diligent in highlighting the most obvious problems associated with the project and shortcomings of the EIR, in this letter I wish to focus on issues that have received less attention.

PUBLIC SAFETY - BICYCLISTS

Elfin Forest and Harmony Grove roads are heavily traveled by cyclists as singles, small groups, and large groups. At times there are more than 100 cyclists riding in the corridor at a given moment. From a **safety** perspective, Elfin Forest and Harmony Grove roads are already quite dangerous for both bicyclists and motorists due to the lack of bike lanes for most of the duration of the corridor. There is literally no space to the right of the vehicle lanes for bikes for large stretches of this corridor. Bicyclists are forced to ride in vehicle lanes, which in turn forces motorists to swerve around them to pass. In order to provide the legally required minimum buffer of 3 feet, motorists are forced to swerve into oncoming traffic lanes to make a pass.

With the current volume of traffic and curvy nature of the road, it is already a problem and somewhat dangerous. With the added volume of cars on this road expected with the new developments, it's going to turn deadly. There will be fewer opportunities to pass safely, shorter intervals between oncoming cars, and drivers will inevitably begin making risky passes that endanger the cyclist, the motorist, and the drivers in the oncoming lanes.

TRAFFIC IMPACTS – BICYCLISTS

From a **traffic impacts** perspective, the bicyclist issue is going to create major congestion when combined with the increased traffic associated with the developments. Under current conditions and given the curvy nature of the road with many blind corners, drivers must practice patience and wait for an opportunity to pass a cyclist safely. This can create a bit of congestion and backup at times, especially when attempting to pass a group of riders. However, with current traffic volumes, it's manageable. As the volume of cars increases, the opportunities to pass safely diminish greatly, which will force motorists to sit behind cyclists who are often traveling at slow speeds of 10MPH or less along this stretch of road. This will create a lot more congestion – and is something that probably isn't factored into the developer's traffic models. It will also result in risky, dangerous passes (as noted above) due to motorists being frustrated/mad at being slowed to a crawl behind a bicyclist.

On a related note, my understanding is the traffic models used in the EIR suggest that very little of the trips associated with the proposed development will be heading west from the development along the Harmony Grove/Elfin Forest Road corridor. This is not a realistic assumption/finding. The fact of the matter is that residents of the proposed development who have destinations on the coast (where jobs, shopping and entertainment are plentiful) will find that the Harmony Grove/Elfin Forest Road corridor is generally more predictable and easier to navigate than the alternatives (Highway 78 or Del Dios Highway). Consequently, the Draft EIR understates to a substantial degree what the true traffic impacts will be along this corridor.

IMPACT OF PROPOSED DEVELOPMENT ON PRIVATELY MAINTAINED INFRASTRUCTURE

Most of the roads in Elfin Forest are private roads, meaning the cost of repairing and maintaining these roads is borne 100% by property owners who live on the roads. The County does not provide resources to help maintain these roads. As more vehicles are added to the Harmony Grove/Elfin Forest Road corridor due to the proposed developments in Harmony Grove, the amount of cut-through traffic on local private roads will escalate substantially, especially when drivers grow frustrated with the congestion they will experience on Elfin Forest Road for the reasons noted above. This will increase the wear and tear on local roads, requiring more frequent and more expensive repair costs for local property owners. The County imposes developer fees and other requirements to offset the impacts and additional costs of maintaining infrastructure due to a development. What about the impact of these developments to our private roads? What is our recourse? At minimum, if the project is approved, the Developer should be required to pay for a portion of the road maintenance costs or pay for the cost of gates to protect private roads from the impacts of these developments.

The list of issues noted above is not meant to be an exhaustive list of my concerns with the proposed development. Indeed, I could spend many more hours of my time and dozens more pages articulating my frustrations and concerns with the proposed project. It does not fit within the character of this community, and its negative impacts on public safety, fire risk, traffic, habitat, and rural quality of life will spread well beyond the boundaries of the development itself. It is unfortunate that the residents of Harmony Grove and Elfin Forest are compelled to spend hundreds of additional hours defending the community vision/plan that we so recently created – all because a single developer wants to profit at the expense of the community. The developer doesn't live in this community, will not have to endure the negative impacts of the project, and apparently has no respect for the community's voice since the proposed development is so out of step with the community plan. I truly hope that the County Planning and Development Services staff, and ultimately the County Board of Supervisors, do the right thing. Listen to the community -- to the residents and voters who live in Elfin Forest and Harmony Grove – and do not approve the Valiano development so long as it does not comply with the community plan.

Sincerely,

Timothy McLarney, Ph.D.
Resident, Elfin Forest
19928 Fortuna del Este
Elfin Forest, CA 92029

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

Because the developer is requesting a much higher density, than currently allowed, this development has many flaws that will have a negative effect on existing property owners as well as the future owners of houses in the Valiano project.

Most San Diego residents are familiar with the horror of the 2014 Cocos Fire but adding over 326 homes in Eden Valley to the approximately 80 existing homes is very frightening considering the significant lack of evacuation routes should another fire, or natural disaster, occur.

As a property owner with over 300' of frontage along Country Club Drive, I am quite aware of the traffic impacts a housing development of this magnitude will contribute, such as noise, pollution, safety for walkers, bike and horse riders. Country Club Drive is often a route used for cycling events such as the recent Belgian Waffle race with over 950 participants.

The above mentioned concerns, safety for residents, existing and future, in case of wildfires and major traffic related impacts cannot be mitigated satisfactorily nor is it the duty or responsibility of existing homeowners to bear the consequences because a developer desires a greater profit.

Equally unacceptable is the plan for Neighborhood 5. The proposed location for a sewer treatment plant, visible to existing home owners as well as anyone traveling along the main road in the valley, contradicts the idea of blending into the existing landscape. When asked why the sewer treatment plant couldn't, actually shouldn't, be located within the larger development, the developer's representatives response was that Neighborhood 5 is at a lower elevation which is required for flow. I do not have the expertise to refute or confirm that information. However, I believe the decision is more about the expense involved and perhaps as importantly, not wanting the facility in the midst of the larger development because potential home buyers might find it offensive.

The technology certainly exists, perhaps at a higher cost, to use some type of pumping system. When Hidden Hills, on the ridge to the east of Country Club Drive, was built in the late 1980s the sewer line was brought down to a pump station at the base of the western edge of the homes and then pumped UP to the main sewer line located on Kauana Loa Drive. The Harmony Grove Village being built by Standard Pacific, which abuts the Valiano project to the south, is building their sewer plant well above the majority of their development.

Sincerely,
Diane McMillen
1498 Country Club Drive
Escondido, CA 92029

Ehsan, Beth

From: mcsparron@sbcglobal.net
Sent: Monday, June 15, 2015 9:20 PM
To: Ehsan, Beth
Subject: Re: Valiano Specific Plan PDS2013-SP-13-001 Notice of Public Review
Attachments: Our Easement Road Flooded.jpg; Storm 013.jpg; PC220188.JPG

Dear Ms. Ehsan

Good evening and thank you once again for the opportunity to give input to this plan which is so important to Eden Valley and the residents of Eden Valley. I'm aware of the tremendous amount of work you and your fellow staff members have put into the plan to date, as well as the public meetings you have arranged and the frustrations those meetings must create, and I thank you for that as well. I am Andrew McSparron, and I am the property owner and live at 1021 Country Club Drive, Escondido.

What I really feel like doing is pointing out the fact that my wife's family built the home we live in in 1969 and my wife and I have lived here with our family since 1981. Our fourth generation is now living here since our daughter, her husband, and their three children decided it was the place for them to raise their family. We quite simply don't want the rural nature of our valley to be destroyed. I just had to start off with that statement even though I realize the developers couldn't care less about the valley and the county's hands are tied by law, policy, regulation, and politics. That being said I have three area of the EIR that I feel are of utmost importance that I don't believe are being properly addressed.

The first area of concern is flood waters, storm runoff, containment and dispersal. I met personally with the Valiano engineer who was addressing the hydrodynamics of the valley. I took him to the bottom part of my property which is near the north central part of the Valiano project in a low lying area. I told him about storms, runoff and flooding that we have incurred since 1981, and I got the impression that he just didn't realize that tremendous amounts of water have gone through this valley in the 35 years that I have lived here. That period doesn't include a 100 year or even a 50 year flood. I have attached photographs from 1992/93, 2003, and 2010. In the 1992/93 photo you can see the water flooding down our easement road and a neighbor's truck stuck in a sinkhole which developed. In the other photos you can see the amount of water that had collected through the valley west of Country Club Dr. Those photos were taken during El Nino years, but were far from something which would actually be considered a flood year. Unfortunately I was unable to locate any photos from 1982, but I can tell you our easement road turned into a raging river which carved out a 6 foot wide, 6 foot deep, 100 yard long crevice in the middle of the road . We were unable to leave our house for 3 or 4 days and then had to walk out to Country Club Dr for the next 6 weeks until we could make repairs to the road. Fortunately we had the foresight to park our vehicles out near Country Club Dr. A few holding ponds scattered throughout the development are not going to properly hold the amount of water which can come through this area during years when we get 20+ inches of rain in a relatively short period of time.

The second area of concern for me is wildfires and the ability to evacuate quickly and safely with 1,000 more homes in the general area than are currently there. In May of 2014 we evacuated twice. The speed of the Cocos fire which came from the west and blew along with the predominant wind, downhill, was unheard of according to fire authorities which we talked to after the fact. Country Club Drive is a narrow road with vegetation and trees, homes and developments along it. Parts of it are too narrow even now for a fire vehicle and a truck and horse trailer or RV going opposite directions to safely pass each other. The width doesn't permit a civilian vehicle to pull to the side and allow emergency vehicles to pass. We live on a dirt easement road and during the last fire it was difficult to access Country Club Dr because of the amount of traffic trying to flee the area. I can't

begin to imagine the havoc that the 700 approved homes south of Eden Valley and then an additional 300+ homes would create during an emergency evacuation of any sort. I don't believe adequate measures or thought have gone into the subject of emergency evacuation.

The final area I will bring up is the impact of day to day traffic. Once again I will mention that Country Club Dr is a narrow roadway which, in some places, isn't wide enough for two large vehicles going in opposing directions to safely pass. The traffic surveys which have been completed to date do not take into consideration the additional 700+ homes which are now being built south of Eden Valley. I have been told that the traffic counts were conducted on days which were specifically chosen to be light traffic days, such as holidays, not reflecting the actual average daily flow. I understand that much of Harmony Village traffic is supposed to exit to the east, but no matter what the developers say, the simple fact of the matter is that most of the traffic from the entire area is going to go north along Country Club Dr. That is where the freeways are. That is where Costco, Walmart and restaurants are. That is where employment is. And that is where the traffic is going to go. I don't need a survey to tell me that, and everyone who lives in the area knows that. I would say that 80% of the time I exit my road and go north on Country Club Dr. During the last meeting at the fire station, someone mentioned a concern about being able to access their road because of traffic. The response was that left turn pockets could possibly assist with that. Country Club Dr is too narrow for left turn pockets and the county would probably have to exercise eminent domain to obtain enough width to widen it to that extent. I question whether or not the county can do that as the road abuts city of Escondido homes along part of the east side. The intersection of Country Club Dr and Auto Parkway is going to become a nightmare that cannot be fixed. It doesn't matter what you do to the traffic signal at that intersection, it won't work, and travel will be impossible, particularly during the morning and evening commute hours.

Despite my comments in the second paragraph, I understand that progress is inevitable and Eden Valley will be developed now or in the foreseeable future. I am not opposed to a property owner developing his property. I have to follow the rules, regulations and plans that have been adopted by the county if I want to improve my property and it seems to me that developers should have to follow the same rules, regulations and plans. I ask that the Community Plan and the General Plan which was approved by and adopted by the County not be modified and that Valiano only be allowed to build a community which falls within that plan.

Thank you for your time, Andrew McSparron







Ehsan, Beth

From: Patrick Molenaar <pmolenaar@yahoo.com>
Sent: Monday, June 15, 2015 4:01 PM
To: Ehsan, Beth
Subject: Please save Harmony Grove From Valiano

Dear Ms. Eshan,

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 Patrick Molenaar and my mom has lived at 2897 Cordrey Dr in Harmony Grove for over 30 years. It is located at the end of Country club next to the proposed Valiano project.

I grew up there and now I live down the street at 9115 Harmony Grove Rd for nine years.

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

The following are my major concerns with the project.

The road can not sustain anymore traffic. There were a couple hundred cars a week at best prior to San Elijo Hills being built. Now there are over 6000 cars a day. There are many accidents weekly. There have been 3 deaths about 200 feet from my drive way in the nine years since I moved there and dozens more h out death.

I have experienced numerous cars in my lanes coming head on towards my family and had to leave the road to avoid collision.

I have been to evacuate my mom from her home during many fires over the years. Even before San Elijo Hills. It's always been a problem getting out due to congestion.

With Valiano and Harmony Grove Village it will be a death trap.

Please do what you can to reject this project as proposed.

Thank you,

Patrick Molenaar

Ehsan, Beth

From: bilmar1999-basic@yahoo.com
Sent: Monday, June 15, 2015 3:04 PM
To: Ehsan, Beth
Cc: Sibbet, David; Loy, Maggie A; Blackson, Kristin; Wardlaw, Mark; Fitzpatrick, Lisa
Subject: Valiano Draft EIR

- Dave Sibbets: David.Sibbet@sdcounty.ca.gov • Beth Ehsan (assigned planner): Beth.Ehsan@sdcounty.ca.gov
 - Maggie Loy: Maggie.Loy@sdcounty.ca.gov • Kristin Blackson: Kristin.Blackson@sdcounty.ca.gov • Mark Wardlaw (Director of PDS): Mark.Wardlaw@sdcounty.ca.gov • If by mail: 5510 Overland Avenue #110 & 310, San Diego, CA 92123
- cc: County Planning Commission:
- Lisa.Fitzpatrick@sdcounty.ca.gov
 - If by mail: County of San Diego, Planning & Development Services, 5510 Overland Avenue, Suite 110 San Diego, CA 92123
- cc: Board of Supervisors:
- greg.cox@sdcounty.ca.gov,
 - dianne.jacob@sdcounty.ca.gov,
 - dave.roberts@sdcounty.ca.gov
 - ron-roberts@sdcounty.ca.gov
 - bill.horn@sdcounty.ca.gov
 - if by mail: 1600 Pacific Hwy #335, San Diego, CA 92101 • phone: (619) 531-5600
- cc: San Dieguito Planning Group
- Bruce Liska: bruce.bettyliska@gmail.com • Doug Dill: douglas.dill@att.net

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 we appreciate that you are giving it the due diligence it deserves. My name is Bill Morgan and I've lived on 2472 Live Oak Road in Eden Valley for 12 years.

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

While there are many issues with the Valiano development as it has been proposed, I am particularly concerned with what I will call uncompensated impacts. By this, I mean impacts that occur after the fact that bear cost. Usually these costs are passed on the city, county or state where the project was constructed.

In my opinion, after reviewing the proposed Valiano project documents, the area of most concern is in traffic flow. The intersection of Country Club and Autopark Way (the main ingress and egress of the project) is already significantly congested. Even now, without HGV built out, we sometimes have to wait two light cycles just to turn left onto Auto Park Way. What's going to happen when all the houses from HGV and Valiano go in? The traffic study doesn't reflect that correctly. This is an unacceptable, unmitigated impact.

There are several other traffic related issues due to the Valiano project:

- Citracado Parkway has not been funded yet and there is no indication as to when it might come online.
- Furthermore, when the Sprinter comes by every 30 minutes (and soon, it will come every 15 minutes, according to NCT) it becomes even more congested. This impact is significant and unmitigated properly in the plan.
- No analysis was made of the traffic heading West towards Elfin Forest Road. We know, from observation, that the traffic flow is more than 6% as stated in the DEIR. There is also a bottle neck at San Elijo Road.
- The sight lines at the intersection of Mt. Whitney and Country Club as well as those at Hill Valley and County Club do not meet county standards.

Without better planning upfront, it is likely all of these issues won't be fully understood until after the Valiano project is complete. At that point, these become uncompensated costs which will likely be borne by the city, county and state. I don't think that is what the taxpayers are expecting of this project.

There are many other issues with the Valiano plan starting with the fact it bypasses the current GP Update, the agreements made to accommodate the Harmony Grove Village development, and the community plan outlined for this area.

I am a resident of this community and not opposed to development, provided it is within the scope of agreements made with our community. The Valiano Project is clearly not, and I am strongly opposed to it as it is currently proposed.

Very Best Regards,

Bill Morgan
2472 Live Oak Road
Escondido, CA
(760) 839-0202

Ehsan, Beth

From: Richard Murphy <rpm10@att.net>
Sent: Monday, May 25, 2015 10:50 PM
To: Ehsan, Beth
Cc: Sibbet, David; Loy, Maggie A
Subject: Re: Valiano D-EIR review

Dear Beth,

Thank you for clarifying that the developer is seeking to have the County waive its requirement to comply with the state emissions regulations and is asking the county taxpayers assume the responsibility and cost of doing so. The statement "...there are no feasible mitigation measures to reduce the Project's contribution to a less than considerable level" is clearly incorrect. California has led the world in reducing emissions since at least the 1970s. There are decades of proven strategies to reduce emissions and the developer could implement a project that would reduce emissions in an equal amount to that which the project exceeds the regulated maximum. The example I mentioned previously would be relatively simple to implement but there are other ways to achieve the same goal. Given that their proposed solution is inadequate, by their own admission, suggest maximizing profits by shifting, as much of the true cost of the proposed development to the taxpayers is the real aim.

I think the your analysis of the causes of sprawl misses 2 important facts. The distorting impacts the subsidies that developers have been able to obtain from the County, such as the one being sought above, have had on the nature and locations of development. Clearly the Valiano proposal would look very different if the developer did not expect the County to subsidize their project. Another very good example of this type of subsidy is the fire station in Harmony Grove Village. The County taxpayers will be paying well over a million dollars a year, as the developer for that project was able to negotiate lower fire fees than is needed to fund the station. Second, the just completed General Plan if followed would prevent the very type of urban sprawl you refer. One of the major goals of the 2020 planning process, as I understood it, was to reduce urban sprawl and the undue burden on taxpayers it causes.

The one question you did not address from my previous email was explaining the process by which the county ensures compliance to the state air quality regulation(s) addressed in the D-EIR. I would still like to better understand it as it may alleviate some of my concerns.

Thank you again,

Richard Murphy

On May 20, 2015, at 3:40 PM, Ehsan, Beth <Beth.Ehsan@sdcounty.ca.gov> wrote:

Hello Mr. Murphy,

Here is some detailed information regarding the criteria pollutant impact:

The Proposed Project would not result in direct exceedances of any criteria pollutant during construction or operation (see Tables 2.2-6 through 2.2-14). As discussed in Section 2.2.2.3 of the Draft EIR, the San Diego

Air Basin has been designated as a federal nonattainment area for ozone, and a state nonattainment area for ozone, PM10 and PM2.5; therefore, a regional cumulative impact currently exists for ozone precursors and PM10 and PM2.5. Although Proposed Project emissions for all criteria pollutants would be below the significance threshold, it is possible that construction associated with several other projects in the general vicinity of the Proposed Project would occur at the same time, and cumulative construction projects would result in a significant cumulative impact for VOC, NOX, PM10 and PM2.5. The Proposed Project would result in a cumulatively considerable net increase in criteria pollutants during construction and impacts would be significant.

In addition to the Proposed Project, there are 41 cumulative projects expected to contribute to the overall growth within the five mile buffer area (LLG 2015). The current General Plan designations on the Project site are SR-1 and SR-2, and the Regional Category is Semi Rural. Under the current General Plan, a maximum of 118 residences are permitted (at a minimum of one acre lot sizes). Applying the average trip rate from the Traffic Impact Analysis, (11.3 trips per du), approximately 1,334 ADT would be generated by the existing zoning. The proposed 334 residences associated with the Project would generate approximately 3,786 ADT, for a net increase from the current zoning of 2,452 ADT. To estimate emissions associated with Project generated traffic, the CalEEMod model was used to determine the net increase in criteria pollutants. Table 2.2-15 in the Draft EIR presents a summary of the net increases in criteria pollutants, which shows that the Proposed Project would cumulatively contribute to the regional air quality. Based on the analysis presented in Section 2.2.2.1, the Proposed Project would be inconsistent with the RAQS and SIP. As a result, there is a significant cumulative operational criteria air quality impact and the Project's contribution to the significant cumulative air quality impact would be considerable.

The Proposed Project has been designed to include electric vehicle charging stations, efficiency measures to reduce energy and water consumption, and exceed the 2008 Title 24 standards by 15 percent. These Project Design Features have reduced the Proposed Project's daily emissions; however, because the Proposed Project would be inconsistent with the RAQS and SIP, short of reducing the Project size, there are no feasible mitigation measures to reduce the Project's contribution to a less than considerable level. Accordingly, these impacts would remain significant and unmitigated.

Your suggestions for off-site mitigation were interesting. That is not currently an approach that we use for air quality impacts. There's such a thing as carbon credits / carbon trading, but I'm not aware of such a system for criteria pollutants. The project does have to purchase biological mitigation off-site, so you could consider the biological mitigation area as fitting your suggestion to buy land that would otherwise be developed to prevent ozone from being introduced to the County. But the catch is that the displaced homes would likely end up getting built somewhere else and if they were farther out, that would increase vehicle miles travelled, thus increasing pollution. And keep in mind that no matter what this project does for mitigation there would still be a cumulative impact because they can't mitigate for the other 41 projects that contribute to the impact.

Let me know if you have further questions.
Thanks,
Beth

Beth Ehsan
Planning & Development Services
858-694-3103

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

From: Sibbet, David
Sent: Tuesday, May 19, 2015 3:04 PM
To: Richard Murphy

Cc: Ehsan, Beth
Subject: RE: Valiano D-EIR review

Richard;

Your welcome and thanks for understanding. We are working on a response, but even a quick response is complicated. We should be able to get back to you by the end of the week.

Thanks

David Sibbet, Planning Manager
COUNTY OF SAN DIEGO, Planning and Development Services Office (858) 694-3091

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

From: Richard Murphy [<mailto:rpm10@att.net>]

Sent: Monday, May 18, 2015 11:13 PM

To: Sibbet, David

Subject: Valiano D-EIR review

Dear Mr. Sibbet,

Thank you to you and your colleagues for meeting with the Elfin Forest / Harmony Grove community this evening to discuss the D-EIR for the proposed Valiano development. It was very helpful to me in understand both the process and some of the issues addressed in the D-EIR.

During the question and answer portion of the presentation I asked a question of clarification with regards to the ozone exceeding state regulations. As I understood the presentation there were 2 things being done to mitigate the excessive ozone caused by the proposed project. First the developer is saying they will take steps to reduce the overall ozone of the development. This seems like a perfectly reasonable thing to do but does not meet the definition of mitigation. To me mitigation would be counter acting the excessive ozone caused by this development by reducing ozone in another area such that the total ozone for the county stays within the required limit. For example buying land that would otherwise be developed to prevent ozone from being introduced to the county. The second activity was to notify the county they will exceed the limit. How does notify the governing body that you won't meet a regulation count as mitigation? That sounds like a request to ignore the regulation or to weaken it or its implementation. What is the process to ensure the county is compliant with the state ozone regulation(s) in the face of developments that do not meet the requirements? There are cost associated with pollution on health and lost productivity that if not addressed is being passed on to the tax payers of the county.

Again thank you for help in ensuring the communities input is heard. I know this is a complex issue and time did not permit a full explanation during the meeting.

Best regards,

Richard Murphy

Ehsan, Beth

From: Richard Murphy <rpm10@att.net>
Sent: Sunday, June 14, 2015 9:53 PM
To: Sibbet, David; Ehsan, Beth
Cc: 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; JP Theberge
Subject: Public comment on Valiano Draft EIR

Dear Mr. Sibbets and Ms. Ehsan,

Again I would like to express my thanks for your efforts to make sure community input on Valiano the D-EIR is heard. This is an extremely important issue to our Elfin Forest / Harmony Grove / Eden Valley communities. I have lived on Fortuna Del Este in Elfin Forest for over 20 years.

I have reviewed the EIR for the VALIANO SPECIFIC 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 and have the following additional comments on the Air Quality Report IPQ-11.

On page 6 of the report it states the annual average temperature in the project area is approximately 55 degrees F during the winter and approximately 74 degrees F during the summer. Given that the source of the pollution is predominately from vehicle sources per the EIR and the fact that the majority of the vehicle traffic both during construction and operationally will be during daylight hours, daytime temperatures, not the average daily temperature, should be used in any calculations to determine the impacts of pollution from the proposed project. Construction is typically limited to daylight hours and most residential traffic; parcel delivery, service calls, school traffic and the majority of commutes will be during daytime hours. The average daily temperatures for Escondido are shown below. Summer daytime temperatures in Escondido typically are in the 80's and low 90's with days of 100 degrees F or more not uncommon. And meteorologists expect average daily temperatures to rise, making matters worse over time. As an example, San Diego experienced its warmest year in 2014 since record keeping began in 1872, nearly 4 degrees above normal.

Climate Escondido - California

°C | °F

Climate table

	Jan	Feb	Mar	Apr	May	Jun
Average high in °F:	69	69	71	75	78	82
Average low in °F:	43	45	47	51	55	58
Av. precipitation in inch:	3.03	3.43	2.64	1.14	0.24	0.12
	Jul	Aug	Sep	Oct	Nov	Dec
Average high in °F:	87	89	87	81	74	68
Average low in °F:	62	63	62	55	48	42
Av. precipitation in inch:	0.08	0.08	0.2	0.71	1.18	2.13

Using an average daily temperature to calculate the impacts of pollution from this project understates those impacts. The chemical reaction of pollutants released in the air is in part determined by ambient air temperature. That is why one of the expected impacts of global warming in California is worsening air quality.

On page 17, table 3 shows ambient background concentrations of air pollutants between the years 2007 and 2011. This ignores the warmer dryer years that we have been experiencing and are predicted to be more the norm in the future than the exception. This again understates the impacts of the excessive pollutants the proposed development will release in to the community. SDAPCD had data published on their website through 2013. In addition there is a monitoring station located on 2874 Progress Pl. which adjacent to the proposed development with 3 others located on the west end of Escondido. Three of the 4 are located west of Interstate 15. The statement on page 16 “there is no ambient monitoring station in the nearby areas of the Project site” is incorrect. This analysis needs to be corrected to reflect current data from the nearby monitoring stations. As it stand currently the analysis in the EIR says very little about the actual proposed project.

The developer on page 25 makes its case for offsite mitigation for the pollution in excess of that allotted for the site by arguing that the General Plan overstates the housing needs in the county. It summarizes the argument this way “The current population and housing in San Diego County are lower than what was projected for the region, and therefore it is unlikely that the additional units from the Project would interfere with the SDAPCD’s goal for improving air Quality in the SDAB.” While this statement “unlikely” lacks sufficient guaranties to be meaningful it does at least point to a real mitigation plan. From a policy standpoint, why it would make sense to up zone a property in an area with elevated fire dangers and with roads the developers states in the EIR has serious and immitigable conditions makes any sense is not clear. Especially, if as they claim the General Plan overstates the housing needs of the County. Setting that aside, if the developer were required as a condition of the proposed project to purchase a property that would otherwise be developed and then preserve it in perpetuity such that an equal or greater amount of pollution the proposed project exceeds its legal allotment then it would be a serious and welcome mitigation plan. Otherwise, if the lower build out were a result of the Great Recession and not due to lower demand, any mitigation would prove to be illusionary.

The EIR makes it clear the air pollution associated with the project will not be static over the proposed development but will be spread by prevailing winds and largely determined by the traffic patterns of the residence. However on page 26 it states when describing mitigation measures “Because the Project addresses several RAQS control measures and the General Plan Goals that are relevant to the Project site, there are not additional measures available.” It then concludes “The Proposed Project would not conform with the RAQS and SIP and would result in a significant and unavoidable impact.” There is no explanation or justification as to why the mitigation must be limited to the development site. Given that the air pollution caused by the development will not remain within the boundaries this seems arbitrary. It is also perplexing since the developer uses off site mitigation to asks for what I’ll call pollution credits for other developers un-built projects as justification to be able to exceed the pollution allotment of their property. It’s hard not to conclude the real goal here is to shift as much of the true cost of the development to the taxpayers and very little with developing a real mitigation plan. The developer as a condition of approval for the proposed project needs to be responsible for implementing a real mitigation strategy that reduces an equal or greater amount of pollution than it exceeds the allotment for the site. It could be setting aside land that would be otherwise developed as they alluded to in the EIR or other projects in the surrounding communities that achieves the same goal. There are literally decades of proven strategies to reduce emissions that Californians have applied successfully.

In summary, this EIR understates the negative impacts of the excess air pollution the proposed project would cause and lacks any real mitigation plans for this pollution. Governor Brown has stated emphatically that California's drought is largely a result of manmade global warming. Air pollution is the mechanism that man is causing the planet to warm. This is the most critical public policy issue facing the state today and the lack of seriousness with which the EIR treats the issue is egregious and unacceptable. The EIR as written does not comply with Executive Orders B-30-15 and S-3-05 and Assembly Bill AB32. The EIR should be sent back to the developer for major modification or the project should be rejected out right. Further emphasizing this point is the fact that the courts have found San Diego's Climate Action Plan inadequate. The courts found the County's CAP did not include comprehensive and enforceable GHG emissions reduction measures that would actually be implemented.

Thank you again for the opportunity to comment on the D-EIR.

Sincerely,

Richard Murphy

Ehsan, Beth

From: Eric Neubauer <eric.neubauer@sduhsd.net>
Sent: Monday, June 15, 2015 2:03 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: Valiano Project

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 Eric Neubauer and I've spent my entire life recreating in Elfin Forest / Harmony Grove / Eden Valley and I've lived in Harmony Grove for the past 3 years.

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

The following are my major concerns with the project:

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

- From the DEIR it is clear that they have not taken into account the most recent fire, Cocos Fire. **See attached pic of flames approaching my house and surrounding areas.** The DEIR states most fires come from the East, when the last few fires, including Coco's came from the West.
- The 326 houses proposed will make evacuation a very difficult proposition. The DEIR does not show how evacuation will proceed during a wildfire event. The only egress, Country Club Road, will be at LOS F (according to the DEIR) and evacuation on this two lane road will be hazardous and create a fire trap. As the last person out of the southern end of Country Club Drive, I saw what being trapped by traffic and limited routes can really be. On the other end of the valley, San Elijo Road (which is a 4 lane road emptying into a 6 lane road) had people sitting in their cars for over an hour as flames were visible overhead on Double Peak. Had the fire not changed direction towards Harmony Grove as they did, you would have had a tragedy on your hands. Country Club is only a 2 lane road with LOS F. It is facing evacuation traffic from 742 houses at HGV, 325 houses at Valiano in addition to the trailers for upwards of 180 horses in Eden Valley.
- The Fire Protection Plan (FPP) makes no mention of evacuating horse trailers and how that would impact evacuation. Please address this. We have twice as many horses in Eden Valley than we have houses. Trailers are slow, hard to maneuver, big and, importantly very hard to load animals on to. There is only one way out of that valley: Country Club Road towards Autopark way. If the fire comes west, like it did during Cocos there will be a massive traffic jam (LOS F means bumper to bumper traffic in non-evacuation circumstances) that could doom residents to a death trap. This is significant and not mitigated.

- The response times from San Marcos Fire District would be 7.5 minutes (above the 5 minutes standard). The DEIR assumes mutual aid from a fire station that hasn't been funded (at HGV) so that fire station cannot be used in the analysis. They are offering to pay into that fire station, but not Escondido Fire which will likely be the first responder. This is significant.
- No analysis was made of the traffic heading West towards Elfin Forest Road. We know, from observation, that the traffic flow is more than 6% as stated in the DEIR. There is also a bottle neck at San Elijo Road.
- The intersection of Country Club and Autopark Way (the main ingress and egress of the project) is already majorly congested. Even now, without HGV built out, we sometimes have to wait two light cycles just to turn left onto Auto Park Way. What's going to happen when all the houses from HGV and Valiano go in? This is an unacceptable, unmitigated impact.
- Furthermore, when the Sprinter comes by every 30 minutes (and soon, it will come every 15 minutes, according to NCT) it becomes even more congested. This impact is significant and unmitigated properly in the plan.
- Citracado Parkway has not been funded yet and there is no indication as to when it might come online. The traffic study doesn't reflect that correctly.
- The sight lines at the intersection of Mt. Whitney and Country Club as well as those at Hill Valley and County Club do not meet county standards.
- Extensive grading, manufactured slopes of up to 60 feet tall;
- 1000 foot walls of up to 20 feet tall, extensive fencing, retaining walls and sound walls,
- not to mention the clustered nature of the development with very high density housing scattered around the project area.
- The DEIR seems to hugely downplay these impacts and show very vague photo simulations (with far away vantage points) which do not show the true nature of these visual and aesthetic impacts.
- Goes against General Plan policy COS 12.1 (does not preserve hillsides and ridgelines, mass grading of natural landforms).

These are just some of my issues with the plan. Especially in a time of extensive drought in California, allowing a high-density, tightly clustered development to be installed in our community does not make sense.

Thank you for your time,

Eric Neubauer

*Automotive Technology
Visual & Performing Art, Video/Film
Computer Game Design
Computer Graphic Design*

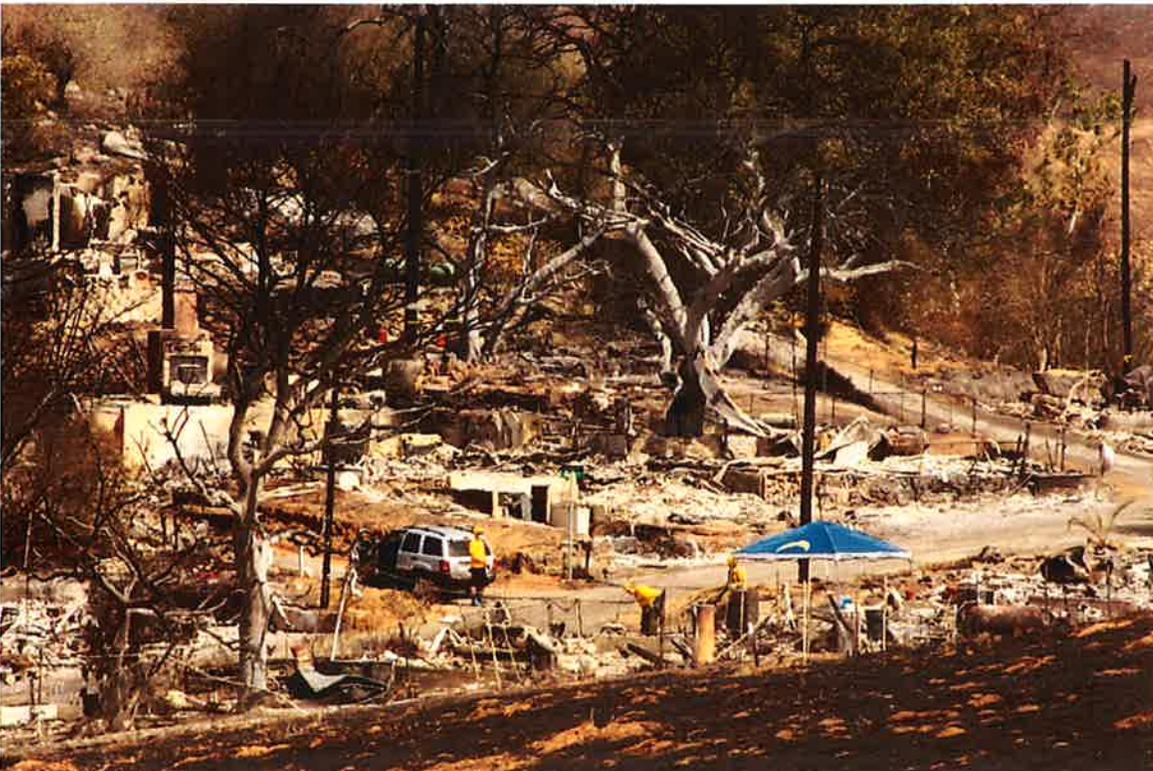
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Ehsan, Beth

From: Julie Neubauer <blondeneubauer@gmail.com>
Sent: Monday, June 15, 2015 4:31 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: Valiano Project

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 Eric Neubauer and I've spent my entire life recreating in Elfin Forest / Harmony Grove / Eden Valley and I've lived in Harmony Grove for the past 3 years.

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

The following are my major concerns with the project:

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

- From the DEIR it is clear that they have not taken into account the most recent fire, Cocos Fire. The DEIR states most fires come from the East, when the last few fires, including Coco's came from the West.
- 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. As the last person out of the southern end of Country Club Drive, I saw what being trapped by traffic and limited routes can really be. 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.
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- 1000 foot walls of up to 20 feet tall, extensive fencing, retaining walls and sound walls,
- not to mention the clustered nature of the development with very high density housing scattered around the project area.
- The DEIR seems to hugely downplay these impacts and show very vague photo simulations (with far away vantage points) which do not show the true nature of these visual and aesthetic impacts.
- Goes against General Plan policy COS 12.1 (does not preserve hillsides and ridgelines, mass grading of natural landforms).

These are just some of my issues with the plan. Especially in a time of extensive drought in California, allowing a high-density, tightly clustered development to be installed in our community does not make sense.

Thank you for your time,

--

Julie Neubauer

Ehsan, Beth

From: Paul O'Loughlin <pgodds@yahoo.com>
Sent: Monday, June 15, 2015 3:59 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: Valiano Project

Ladies and Gentlemen, Planners and Staffers, Councilmen and Board members,

I am a resident of the Hidden Hills neighborhood community immediately east of Eden valley. I bought my house with the notion that my view would never change. In the last few years we have seen the view change with the demise of an avocado grove, the loss of the chicken ranches, the rise of 742 new homes and hundreds of acres burned. My property overlooks the valley where I had a bird's eye view of the DC10 converging on the Los Coronados Hills dropping fire retardant on the landscape in the Cocos fire last May. I discovered that reverse 911 doesn't work with Voice over Internet protocol in the Witch fire in 2007 and watched East Escondido burn from my living room window in the Cedar fire in 2003. I was evacuated for several days for the last two fires and sustained only minimal property damage from the Cocos fire. I was amazed at how quickly the fire had shifted literally in minutes with a sunny sky one moment to a darkened and eclipsed sky in the next moment. When I woke up on Thurs 15 May 20014, I believed we had escaped the worst of the fire threat, but we found ourselves leaving in minutes with what we were about to unpack. Many were caught off guard. Some went to work and were not allowed back into the neighborhood with their automobiles to retrieve their pets. I loaned my truck to a such a neighbor with two large dogs and whose cat urinated in my new truck and left a lasting reminder of the of the fires every time I get into my front seat.

If the Valiano Project continues as planned, I can only imagine the much sadder stories that will be told after the next fire given the new homes being built and already up for sale in Harmony Grove and more inflammatory is the density with which Valiano is projecting into Eden Valley. Aside from the fact that we are in a state wide water crisis where more homes will clearly put an added strain on the environment, we are adding homes before there is egress improvements. The Nordahl Rd overpass is already at maximum capacity during rush hour and will only see greater constraints even if Citracado Prwy is completed to Harmony Grove Rd. I am not against progress or development of the area, but the shear number of added homes without improving the infrastructure of roads and safety of pedestrians, cyclists and live animals and giving greater thought and planning to the possibility of a prolonged water crisis is fool hardy.

In my opinion, more opinions need to be heard and vetted before any future progress is made on the Valiano Project.

VR
Paul O'Loughlin
760-385-2700
OOMA

Ehsan, Beth

From: Debbie O'Neill <doneill@catlover.com>
Sent: Saturday, June 13, 2015 6:34 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
Subject: 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 County Planning and Development Services Staff,

I would like to voice my opposition to the above referenced DEIR and the proposed development known as Valiano as it is currently proposed. I am not opposed to development of our valley but would like the development to be in keeping with the community and county plan of keeping Elfin Forest, Eden Valley, and Harmony Grove rural. There are many reasons to oppose the DEIR as currently proposed but I will only give you my two most pressing concerns.

First, the DEIR does not adequately address the fire danger present in our valley, and how the county plans on evacuating the residents on our few country roads in a fire emergency. During the most recent Coco's fire, my husband and I had to evacuate our animals quickly after the winds turned and the fire quickly raced down the hillside towards our house. I drove out past 10-20 foot flames that were coming up the hill from the Harmony Grove Spiritualist Association. We were lucky. Although we were blocked from leaving on Country Club at Kauana Loa due to fire being fought on that road, we were able to leave on Harmony Grove because there weren't that many of us in the valley. It is my understanding that those people who lived in San Elijo Hills were caught in a traffic jam and could not evacuate quickly. And they have wider roads and more lanes than we do. Luckily the fire did not reach them. My neighborhood was not as lucky. Most of the Spiritualists, and several of my neighbors on Country Club lost everything. If they had gotten caught in the kind of traffic that will be here if Valiano goes through as proposed, they most likely would have died trying to get out. I have lived in Harmony Grove for 14 years, and have been evacuated due to fire three times. Twice for the Cedar fire (which passed us but the next day after we returned, it sparked back up at Del Dios and came back up the hill), and once for the Coco's fire. If Valiano is built as proposed, we will have to shelter in place. This does not sound safe to me.

Secondly, I believe the DEIR does not adequately address the destruction of the flora and fauna of our valley. We are fortunate to have some of the little remaining Coastal Sage Scrub and Mixed Chapparal that exists in San Diego County. The Valiano project intends to leave pockets of this unique vegetation for animal habitat. Unfortunately studies have found that leaving pockets of a biome is not effective. Animals need connected parcels of the vegetation that they are adapted to in order to survive and prosper. On our parcel of land (3 acres) we have encouraged and planted native vegetation in order to promote the native animal species to stay on our land. What has been remarkable about that as a person who grew up in the suburbs, is that I have learned to appreciate our native plants and animals. The chapparal has something blooming almost every part of the year which allows the native animals to have food throughout the year. When I walk out in my yard, I see and hear birds, coyotes, rabbits, snakes, lizards, and many other animals. Now that the new Harmony Grove Village has been built, I sometimes walk on the walking paths and it is remarkable what an environmental desert has been created. I see very few animals over there but as soon as I cross Harmony Grove Road back to the rural area, there are lots of animals. I'm sure eventually animals will move into the area. However, they most likely will not be the native species, or the native species will be out of balance. Only the animals that can survive on the non-native plants which have been planted by the developer (and later the residents) will thrive. This is an area that really can't be fixed by buying mitigation property somewhere else. The animals and plants of our valley need land here in our valley.

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
Beth Ehsan (assigned planner): Beth.Ehsan@sdcounty.ca.gov
Maggie Loy: Maggie.Loy@sdcounty.ca.gov
Kristin Blackson: Kristin.Blackson@sdcounty.ca.gov
Mark Wardlaw (Director of PDS): Mark.Wardlaw@sdcounty.ca.gov

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,

I live at 2952 Milpas Drive and have been an Eden Valley resident for 13 years. This is a very stressful time for my family and community as we feel that the Valiano project by Integral Communities is threatening to destroy our treasured rural lifestyle that Eden Valley residents have enjoyed since the early 1900's. This area is unique in San Diego County and the communities of Eden Valley, Harmony Grove, and Elfin Forrest are some of the last remaining rural to semi-rural communities west of Interstate 15.

As I reviewed the DEIR, it is apparent to me that Integral studied the minimum amount required by the County of San Diego. In this EIR there appears to be a focus on ensuring the highest density possible and there is little focus on the safety of the future Valiano residents and surrounding communities. For example, the numerous waivers regarding fire safety standards.

While reviewing the DEIR documents I have found numerous pieces of erroneous information and descriptions which are misleading. I have attempted to note many of them in the following response:

Project Description

1. The project is described as being a Smart Growth project. However, in the video I sent the county staff of the NC17 hearing, it is clearly stated that the project does not lie within the Smart Growth areas. All mention of Smart Growth should be removed from the EIR as this project does not meet the stringent Smart Growth standards.
2. The distances in paragraph 1 of section 1.2 are inaccurate. I have found distance inaccuracies throughout the DEIR. I checked distances via Google maps to be shorter than distances calculated via Google maps. Most are one or miles off. This is very misleading when reviewers, who may not be familiar with Eden Valley, read them.

For example, the opening descriptions states, "The Project site is located approximately 1.7 miles west of Interstate 15 (I-15) and 0.6 mile south of State Route 78." According to Google maps the distance from Valiano's Eden Valley Lane entrance to State Route 78 is 1.4 miles or a five minute drive time without traffic.

Every distance cited in the DEIR needs to be rechecked.

3. "The Project site is generally divided into two areas, a larger northwestern portion of approximately 191 acres and a smaller southwestern portion of approximately 48 acres. The two areas connect corner to corner (Figure 1-2, Aerial Vicinity Map)."

To say these two properties adjoin each other is a reach. The two properties may share a few feet of property line. However, Neighborhood 5 is completely separate from all the other neighborhoods and will be accessed from Country Club Drive only. Residents from Neighborhood 5 will have to leave that area via a separate entrance and enter into another Valiano entrance to reach some of the project facilities. This is more like two communities rather than one. A design that unites these communities should be studied.

4. "Building styles within these neighborhoods would include a variety of architectural themes and styles, including Craftsman, European Cottage, Mission, Monterey, Spanish and Italian (refer to Subchapter 2.1, Aesthetics, Figures 2.1-6a through 6f). Proposed residential units would vary in architectural details; however, the architecture is intended to be compatible with the semi-rural ranch setting found in the existing valley and surrounding area."

How the mentioned architectural themes and styles compatible with Eden Valley's semi-rural ranch setting? Most of the styles mentioned are found in village type developments and not in rural settings. Ranch style architectural themes should be studied. In addition, single story homes should be mandated for any homes set on highpoints or ridgeline in the valley to lessen their visual impacts.

5. Since neighborhood 3 is situated next to the equestrian trail loop, the trailhead park, and the Hunter Equestrian Center it should consist of ½ acre or larger lots to facilitate horse keeping. This may help alleviate conflicts between new urban residents and existing rural residents.

To further alleviate conflicts between existing and new residents, a design that places larger ½ acre to 1 acre lots next to all existing Eden Valley residents' properties should be studied.

6. Neighborhood 1's description should include the number of condominiums that will be part of that neighborhoods design.

Given the fact that many of the other neighborhoods will have secondary dwelling units, which county staff has said can be rentals, I do not see the need for the 49 condominium units. These do not fit into a semi-rural environment and are an urban development component found miles

away from Eden Valley in city areas such as Escondido and San Marcos. As I understand it, the secondary dwelling units can satisfy the affordable housing requirements.

The removal of all of the condominiums should be evaluated for the reasons stated above.

In addition, the secondary dwelling units did not appear to be included in the traffic study. The traffic study should be redone to include the traffic from the secondary dwelling units.

7. The trail head in Neighborhood 3 appears to terminate at the Hunter Equestrian Center's property line. The trail is supposed to connect to the private road that shares Neighborhood 3's northern property line.

The trail head needs to be reconfigured to allow northern Eden Valley residents access to the trail system.

8. "The existing equestrian complex previously used in association with the Harmony Grove Equestrian Center, located in the southern portion of Neighborhood 5, would be retained, open to the public and privately maintained. Portions of the existing equestrian training and boarding facility would accommodate private horse boarding. The 0.2 acre site would be reconfigured to allow public horse trailer parking and use of an exercise ring for the public to access the multi-use trail."

A 0.2 acre site is extremely small to facilitate all the mentioned activities. Even a two acre site, assuming this is a typo, seems small for such an operation. This area should be increased to 5 acres or more to properly operate as a boarding facility and public riding space.

9. Who will be responsible for the care and maintenance of the equestrian center? If it is the HOA, what guarantees can be made that this facility will remain open and viable. This entire concept is welcomed, but it requires further study to ensure it does not become abandoned or sold off for more development.
10. To facilitate a sense of a community, all parks and recreational facilities should be open to existing residents of Eden Valley and Harmony Grove. Having parks that are restricted to Valiano residents will not foster integration with the existing community.
11. "The proposed agricultural easement area currently includes avocado orchards, portions of which were damaged or destroyed by a recent (2014) wildfire."

First of all, nearly all of the avocado orchards were destroyed by the Cocos fire. The small portion of grove that was not destroyed have since died due to lack of water (the fire burned all of the above ground irrigation). Secondly, the Fire Protection Plan states that there have been no major wildfires in 50 years and yet here is a statement in the project description that notes fire damage from the 2014 Cocos fire. It is obvious that the applicant is aware of the 2014 Cocos

fire and chose not to study it. This brings into question their motives and desires to ensure they build a project that has the public's safety and best interests in mind.

The Cocos fire, as well as all other local fires that have occurred in the local area, need to be studied. Eden Valley has its own weather patterns due to topography which have a dramatic effect on fire behavior.

12. Eden Valley lane is designated as one of two points of entry to the project for Neighborhoods 1 through 4. Approximately 500 feet from the intersection of Eden Valley Lane and Country Club Drive is an Arizona crossing which floods in times of heavy rain. I have not seen any mention of the Arizona crossing in the DEIR.

The Arizona crossing needs to be studied to see if a bridge will be necessary to ensure road access in times of heavy rain.

13. Having only two access points plus one emergency access point that all lead to Country Club Drive, a two lane, traffic calmed, country road seems inadequate. Country Club is also the fastest route to State Route 78 for the residents of Harmony Grove Village. In the traffic section of the DEIR, Country Club Drive is noted as having a rating of LOS F. This will have a dramatic impact on emergency response times which do not appear to have been studied with the expected road rating.

All emergency response times should be calculated based on the LOS F rating for Country Club Drive. In addition, a full emergency evacuation plan should be studied to ensure all residents can evacuate the area in a timely and safe manner given the known fire behaviors in the valley.

14. Lighting – Residents of Harmony Grove and Eden Valley have learned many lessons from Harmony Grove Village. One of those lessons is that the county may need to install additional lighting on road segments outside the planned development to ensure safety given the additional traffic volume brought in by the development.

As the additional lighting outside the project is triggered by the population growth of the proposed project, the EIR should study where such lighting will be required and present those locations. Those additional lights will have a direct impact on existing resident's enjoyment of dark night skies and will create a visual impact.

15. Grading – This project is proposing a massive amount of cut and fill grading. Given its extreme proximity to existing homes and the community of Eden Valley, this activity is going to have a dramatic impact on the existing community. In particular, there are several areas noted in the grading plan where blasting will occur adjacent to existing homes.

Currently there are residents fighting with the Harmony Grove Village developer over property damage that occurred during their grading operations. The applicant should appraise all homes in the immediate area of the blast and grading sites prior to starting grading or blasting operations at the applicants cost. Once the existing residents and the applicant agree that the

appraisal is accurate, the applicant could begin the grading activity. This will provide home owners a way to prove that any damage that occurs due to blasting or grading was directly related to the applicant's activity. Alternatively, the county should provide guidance to homeowners about how to protect their property from these activities.

Aesthetics

1. The density of the proposed project does not match the densities of the surrounding communities. Even the Harmony Grove Village lots that adjoin the proposed project area are large lots. This project should be scaled back to better match the existing communities of Eden Valley and Harmony Grove.
2. Image in Key View 1 in PDS2013-SP-13-001-DEIR-Chap2.1-Aesthetics-pt6.pdf shows an existing cut in the hillside up in Coronado Hills (there are several not seen in this photo) and clearly shows that vegetation does not regrow in those cuts (that cut is more than 13 years old – the length of time I have been an Eden Valley resident). This is due to the large amount of decomposed granite and granite rock which support very little plant life once native soils are stripped. There are an extensive number of steeply graded slopes within the project plan and they will be a visual impact for decades. More studies should be performed regarding how these visual impacts will be mitigated in both the near and long term. In addition, more studies should be conducted to see if the number of such cuts can be limited.
3. It is proposed that all retaining walls will be planted or hidden with vegetation and their visual impacts mitigated once plantings reach maturity. As seen in the above mentioned photos, cuts and retaining walls will most likely appear as scars on the landscape for decades to come, not a mere 5 years as noted.

The number of cuts and retaining walls should be minimized. I also noted that there is one continuous retaining wall that will be over 1,000 feet long and average 20' tall and other graded slopes in excess of 60' tall. These will be visible from most, if not all, of Eden Valley. They will also be visible from major highways, local trails, a good portion of Escondido, and from parts of San Marcos. It is a major visual impact and I do not see how it can be mitigated knowing that plant life does not take when planted into graded areas that already exist in Eden Valley. If the plan is to use trees, very few trees grow well in granite and will take decades or more to reach maturity.

These cuts, retaining walls, and steeply graded slopes need further study to see what plant species will grow there and how long it will take them to reach maturity.

4. In the same document, photo simulation A is inaccurate as the homes in the background appear much larger than the homes that are supposed to be in the foreground. The photo simulations should be re-done to more accurately reflect the size of the proposed homes at the scale matching the photo they are placed into.

Hazards

1. There are several references to section 3.1.8, yet there is no section 3.1.8 in the DEIR. While I was able to figure out what the correct section was, this may have been very confusing to area residents who attempted to read through and follow references in the DEIR.
2. As determined by the State Fire Code, fire severity is zoned as "Very High" fire severity for some portions, and "Moderate" for the remainder of the Proposed Project site (located approximately 11 miles inland from the ocean). Several characteristics of the Project location, including topography, vegetation, and climate zone contribute to risk of fire at the site.

According to the fire severity maps, the project area is set as a "Moderate" fire severity zone. This is most likely due to the fact that the current project area consists of grasslands with some wooded areas and agricultural lands which are assumed to be watered regularly. The entire area surrounding the project site is listed as a "Very High" or "High" fire severity zones due to the known fire hazards of the area and the number of existing homes that are in these high fire areas (as the FPP notes, populations are often the source of ignition for wildfires). Once Valiano is built, I believe the area will also be rated as a "Very High" or "High" severity zone and this should be studied.

In addition, the map showing the fire severity zones clearly shows ingress and egress routes of the Valiano project area as having to cross through "Very High" severity zones. This is a key point of review. As we saw in the Cocos fire, had the Valiano project been complete, residents would not have been able to evacuate via Mount Whitney Road as it was on fire. The fire jumped in many places along Mount Whitney and also jumped across to Koana Loa which blocked that route for evacuation. This left one way out, traveling north on Country Club Drive which terminates at the intersection with Auto Parkway which is currently an impacted intersection that often times requires Eden Valley residents to wait one or two light cycles to be able to make a left turn to reach State Route 78.

According to the DEIR traffic section Country Club Drive will be at LOS F – essentially bumper to bumper traffic that is flowing. So how will the residents of Harmony Grove, Eden Valley, and those in the new Valiano project escape a fire such as the Cocos fire? In addition, given the fact there are more horses and large animals in Eden Valley than there are homes, the roadways will be further impacted with people pulling large trailers as they evacuate their animals. The Fire Protection Plan appears to not have study evacuation routes at all which is a major oversight given the fact that the Cocos fire provide a recent example of area fire behavior and how well the roadways were able to evacuate current residents.

For this reason alone the Fire Protection Plan and the hazards section of the DEIR need to be re-written and the events that led up to, during, and after the Cocos fire need to be studied in detail.

3. "Several characteristics of the Project location, including topography, vegetation, and climate zone contribute to risk of fire at the site." The hazard section notes the unique features of Eden Valley that contribute to fire risk, yet the FPP does not study them. Instead it uses regional modeling which is inaccurate when applied to Eden Valley.

A new FPP that studies the specific area and conditions needs to be performed. This is particularly important given the fire behavior observed during the 2014 Cocos fire which burned more than 90% of the project area and other local fires that have threatened the project area.

4. "In the FPP, several scenarios were developed to determine the potential fire behavior of a wildland fire that might occur in the vicinity of the Proposed Project."

The FPP is inaccurate at best as it only studied fire dangers during Santa-Ana winds. As previously mentioned it did not model the local area nor did it study the most recent Cocos fire which burned more than 90 % of the project area. Given this recent fire, the FPP should be redone to take into account the local area, its weather patterns, and a thorough study the Cocos fire which was driven by a west wind when it burned Eden Valley and Harmony Grove.

5. "The FMZ shall be a minimum of a 150-foot area, or as approved by the SMFD, surrounding and extending in all directions from all structures, in which flammable vegetation or other combustible growth is cleared away or modified"

The FMZ should be contained within the applicant's project area. Currently it overlaps neighboring properties and they do not have easements to create such an encumbrance on those properties. This can be easily remedied by the applicant removing the homes whose FMZ exceeds the project area.

6. "All newly constructed structures would be built to ignition-resistive building requirements, as specified in the FPP. The installation of automatic interior fire sprinkler systems would be required (per National Fire Protection Association Standard 13D and 2013 California Building Standards Code). All glass or other transparent, translucent or opaque glazing materials, including skylights, shall be constructed of tempered glass or dual glazed windows with minimally one pane of tempered glass."

As a former fire fighter, I have witnessed every one of these protections measures fail during a wildfire. Most are good measures to protect a home that suffers a small internal fire, such as a kitchen fire and are designed to give firefighters time to extinguish a house fire before it spreads to neighboring homes – **but they do not protect from the type of temperatures generated during a wildfire.**

During the 2007 Witch fire I worked in the North/West corner of Ramona where supposed "shelter in place homes" were constructed to standards that exceeded the codes mentioned in the above quote. They suffered an approximate 80% loss in that neighborhood and surrounding areas. Interior fire sprinklers are only effective if they have water pressure, however during a

wildfire when firefighters are drawing large amounts of water from hydrants the local water pressures drop which makes sprinkler system in-effective. I did see homes where the sprinkler systems saved the area that the water spray could reach, while the surrounding areas within the same home were a complete loss. I have also seen tempered glass melted due to the temperatures of a wildfire. An additional issue is the transfer of heat through windows and other weak points in the structure. It is not unusual for this transfer of heat to ignite items inside the home which are near windows and other areas where heat penetrates the home – they then literally burn from the inside out. Other issues include wood fencing which literally leads a fire to a home, yet fencing is rarely reviewed when looking at fire protection measures.

When a wildfire approaches an area where there are homes present, fire fighters generally move into a structure protection mode. This means that one or more engines are stationed at each home being threatened by the wildfire and they begin trying to do all they can to ensure the home does not ignite. However, when there are lots of homes facing a wildfire there are not enough firefighters or engines to protect every home and this protection measure is quickly overwhelmed. To avoid this scenario, areas in the wildland urban interface should consist of a sparse number of homes making them more defensible.

Large scale developments in the wildland urban interface should not be allowed. These types of developments have historically suffered large losses of property and have also caused loss of life on many occasions. The project plan should evaluate reducing the number of homes that lie in the wildland urban interface.

7. Lots with reduced defensible space – I am gravely concerned at the number of waivers being granted to the applicant in regards to fire protection. Perhaps these were granted due to the inaccuracies portrayed in the FPP? Given the fact that Eden Valley and Harmony Grove are surrounded by areas rated as “severe fire danger” and the data from the recent Cocos fire, all waivers should be rescinded to ensure the safety of area residents as well as those who might purchase a home in the proposed project. There are simply too many exceptions in this DEIR that raise the possibility of loss of life and property.

The applicant should take a closer look at the safety of this proposed project and redesign a project that puts safety before density.

8.

The Proposed Project is located within a Local Responsible Area (LRA) served by the San Marcos Fire Department (SMFD). SMFD’s capacity to provide fire protection services to the Proposed Project is discussed in more detail in Section 3.1.8, *Public Services*. Escondido Fire Department (EFD) and County Service Area 107 (Elfin Forest) also have fire protection facilities within the area; SMFD has established several mutual and automatic aid agreements with these surrounding fire departments, as discussed in Section 3.1.8.

It has recently come to light that CSA107 will not be merging with Rancho Santa Fe Fire. Instead Cal Fire and San Diego County Fire Authority will be handling it which may involve staffing by volunteer fire fighters. I have not seen any response or attempts to contact proper authorities in either of these organizations regarding the heavy dependency the proposed Valiano project has on the new Harmony Grove Village fire station. It is for this reason I feel that the FPP and the DEIR need to be re-evaluated and inclusive of these organizations.

The FPP also needs to study the number of apparatus and staff that will be present at the Harmony Grove Fire Station (as well as other surrounding mutual aid stations in Escondido) to ensure there is enough to support mutual aid calls. Just because a station or fire protection district agrees to mutual aid, does not mean they are obligated to respond. For example, if the Harmony Grove station was in place during the Cocos fire, they most likely would not have provided mutual aid to the Valiano project area because they would have to have resources to protect their fire protection district that was under threat.

In addition, Eden Valley residents have to pay an annual fee to Cal Fire as we are part of their service area, yet I was unable to find any attempts to reach out to Cal Fire in our public documents request or in the DEIR. Again, the Fire Protection Plan and the DEIR need to be pulled back and new studies need to be performed by all service areas that will be responsible for the Valiano project area. This is especially necessary given the number of waivers pertaining to fire safety that are being granted by San Marcos Fire. Additionally, those waivers should be based on mutual agreement by all resources expected to provide mutual aid given the dependency on them in this DEIR and FPP.

9. Given the fact that this projects FPP relies heavily on both the Escondido Fire Department and the proposed station in Harmony Grove Village for mutual aid to meet county standards, consideration should be given to redrawing the areas of responsibility for fire service. As a former fire fighter, I see that Escondido and Elfin Forrest Fire will be the primary responders 90% or more of the time.
10. **Each lot owner would be individually responsible for the fuel modification maintenance on property lots, including all measures included in the FPP. Property owners would be members of a legally constituted HOA which would support the maintenance of common areas (including roadsides) in perpetuity. Please refer to Appendix L for specific requirements for the ongoing fuel modification maintenance.**

Project Design Features for Homes with Reduced Defensible Space

The following Project Design Features would be included for each dwelling within the Project site that provides more than a 100-foot defensible space, but less than 150-foot defensible space required by the SMFD.

- **The following lots fall below the 150-foot defensible space requirement: 1, 3, 4, 119-123, 127, 135, 149, 150, 158, 162, 163, 170, 171, 258, 268 and 289 and shall be called out on a separate plan sheet in plan submittal. The plan sheet for these dwelling units shall list the following requirements shown below.**

Did San Marcos Fire sign off on these lots since their defensible space is less than the requirement? If so, is this considered another fire waiver for the project? Have the other mutual aid fire departments signed off as well?

Are any of these lots on the periphery of the project adjoining the Coronado Hills, adjoining any of the open spaces outlined in the DEIR, or other fire prone areas? If so, this appears to be a major issue as the limited defensible space may be adjoining fire prone areas which could accelerate the spread of fire causing loss of life and property.

11. The Project could be inconsistent with the FPP if there is no service agreement between the Applicant, CSA/HGF authority, and SMFD to facilitate service. Therefore, prior to occupancy of any structure that does not meet the five minute travel time according to Figure 7 of the approved FPP, either the Harmony Grove Fire Station must be in operation and providing service, or alternate mitigation measures must be provided to the satisfaction of the County Fire Authority and the PDS Director. The fire station construction is expected to be funded by mid-2016 and operational by 2017. A two-acre lot has been transferred to the County for the new fire station and a Community Facilities District (CFD) has been established as the funding mechanism. Impacts are less than significant with completion of the service agreement and construction and operation of the fire station.

The above requirement should be met prior to the start of grading for the project. Fire ignitions during the grading process are common. Two recent large fires were started during grading operations: the 2014 Bernardo fire was started by a backhoe and the 2013 Harmony Grove fire was started by heavy grading equipment working on Harmony Grove Village.

Given the estimated 7.5 minute response time by San Marcos Fire, any fire started at the base of the Coronado Hills, where there will be heavy grading and blasting operations for the Valiano project, will see extremely fast rates of spread as the fire will run uphill. By the time San Marcos fire could be onsite the fire could easily be threatening homes in Eden Valley and the Coronado Hills. Thus it is imperative that all fire protection measures, noted as required for occupancy, must be in place prior to the start of grading for the project to ensure the safety of the existing area residents.

12. Pg 2.9-20 "Further, the Project would specify maintenance requirements to provide fire safety."

What are these maintenance requirements and who will be responsible for performing them?
This is not noted in the Fire Protection Plan or DEIR documents.

13. "The FPP concluded that any wind or topography driven wildfire burning under a northeast (Santa Ana) wind pattern creates a very high wildland fire hazard, especially for wildland fires starting off-site north and northeast of the Proposed Project site."

According to this statement the fire dangers are seen as a wildfire burning through the cities of San Marcos or Escondido as they are located to the north and northeast of the project site. This

clearly indicates that the study was for the San Marcos area as this statement would be correct for the city of San Marcos.

I believe these scenarios to be an unlikely scenario here in Eden Valley and have never occurred in the 13 years I have been a resident. The three times I have had to evacuate my home in Eden Valley were all due to fires that started to the west, south, and southeast of Eden Valley that were being driven by winds primarily out of the west.

14. Page 29.20-21 of PSD2013-SP-13-001-DEIR-Chap2.9-Hazards.pdf concludes that the wild land fire hazards would be less than significant. I do not see any study or consideration for a fire that starts west of the project with winds blowing from West to East, which is the dominant wind in the area, and is the exact scenario that occurred in the Cocos fire and other major fires in the local area. A study should be conducted about such an occurrence. Given the terrain of the area, embers will be raining down on the development from above, which is what occurred in this area during the Cocos fire. In addition, 90 to 95% of the project area burned in the Cocos fire which I would think would warrant more stringent study.
15. In the Fire Protection conclusion I do not see any mention of the Sprinter track crossings. It is known that the roads at all of the Sprinter crossings are already impacted by traffic. In addition, it is also known that the NCTD is planning to increase the frequency of Sprinter train trips through the area which will further impact response times. These impacts to response times from San Marcos Fire should be included in this study.
16. How can the fire protection summary be less than significant when the entire project will be relying on mutual aid agreements for 100% of the project area? In addition, the mutual aid agreement is based on a fire station that has not yet been built or fully funded. It also makes incorrect assumptions that it will become part of Rancho Santa Fe Fire. I also see no mention or study of what type of fire apparatus will be present at the new station, number of personnel expected to be manning the station, or hours of operation of the station. Currently the Elfin Forrest Fire Station is manned by volunteer fire fighters and at times may have as few as 1 to 3 firefighters which can limit their ability to respond to mutual aid calls.
17. The Fire Protection conclusion is also based on a planned implementation of RCIP, which if implemented on time, would be a very new system by the time the project is built. Thus, if RCIP is implemented it may not reach full effective use for a year or two after implementation. It seems that the fire protection conclusion is once again relying on something that is not yet in place and known to function well in this area, further study is needed.
18. When the above considerations are coupled with the various waivers the developer has been given for road widths, reduced FMZ for some lots, the need to attain easements for the FMZ, variations in the vegetation management program, etc... I fail to see how this all equates to a less than significant finding. More study is needed to validate this finding.

Public Services:

1. The Proposed Project site is located within the service area of the Escondido Union School District (EUSD) for K-8 education, and the Escondido Union High School District (EUHSD) for grades 9-12. EUSD serves more than 18,000 students in 23 schools. EUHSD serves the major portion of the City of Escondido and portions of the surrounding unincorporated area, and has more than 8,500 students across three high schools and one continuation campus. Additionally, EUSHD opened a new high school, Del Lago Academy, in August of 2013. In the EUSD, Rock Springs Elementary School and Del Dios Middle School are the schools that would serve the plan area for the Proposed Project, and are located approximately 2 and 1.5 miles from the Project site, respectively. The nearest high school to the Proposed Project area within the EUHSD (which would serve the Proposed Project) is San Pasqual High School, located approximately five miles from the Project site.

According to Google maps, the Del Largo Academy is 2.7 or 3.2 miles, depending on the roads taken, from the intersection of Mount Whitney Road and Country Club Drive – which is the closest point the proposed project is to the school. It should be noted that Del Largo Academy is a charter school and not all students will be able to automatically attend this school. To reach Del Dios Middle school the distance is 2.1 to 2.8 miles and Rock Springs Elementary is 3.9 miles away. The measurements described above must be as the crow flies and should be adjusted to reflect actual driving and walking distances.

2. The closest station to the Proposed Project site, Fire Station #3, is located at 404 Woodland Parkway in San Marcos, approximately 1.5 miles from the Project site. The station is fully staffed 24 hours per day by five personnel. Equipment includes one paramedic assessment engine company, one paramedic ambulance, and one cross-staffed type III Wildland Engine (City of San Marcos 2013). In 2011, the SMFD responded to 7,136 emergency calls (or an average of approximately 20 total daily calls to the four stations), 70 percent of which were

medical emergencies. The department, on average, arrived on scene for medical and rescue emergencies 4 minutes 47 seconds after receiving notification from dispatch (SMFD 2011).

According to Google maps the fire station is actually 2.8 miles away from the closest primary access point to the project. The above paragraph makes it sound closer than it actually is and it should be corrected. Assuming that the estimated 7.5 minute response time noted in the FPP and DEIR was calculated on the erroneous 1.5 mile distance to SMF station #3, it should be

recalculated using the proper distance. According to documents in the DEIR this calculation is made on an average speed of 35MPH. Thus at the new distance the response time is 8 minutes. This response time does not appear to take into account that there is no way to reach the project site without crossing the Sprinter train tracks. Should a responding engine encounter a train at an intersection, the response would be further delayed an additional 3 to 4 minutes.

These distances and San Marcos Fire response times all need to be re-evaluated.

In addition, the later paragraph states that the closest Escondido fire station is 3.1 miles away, when it is in fact 2 miles away (from the intersection of Kuana Loa and Country Club Drive) according to Google maps and they do not have any railroad crossing. This means that Escodido fire will be able to provide more adequate response times than are noted in the FPP and DEIR.

Again, the redrawing of areas of responsibility needs to be considered given the density of this project, its fire history, and response times for San Marcos Fire to ensure the safety of area residents.

3. **As described in the Valiano Specific Plan and noted in the Project Facility Availability Forms, police protection services for the Proposed Project would be provided through the San Diego County Sheriff's Department, under contract with the City of San Marcos. Specifically, the Project would be served by the existing Sheriff's San Marcos Station located at 182 Santar Place (approximately 1.5 miles northwest of the Project area). This station serves a population of more than 111,000 residents located in the station's service area of over 100 square miles (San Diego County Sheriff's Department 2013a). The Sheriff's San Marcos Station provides law enforcement services to the City of San Marcos as well as the unincorporated communities surrounding the station including parts of Escondido, Harmony Grove, Elfin Forest, Lake San Marcos, Mountain Meadows and San Pasqual Valley.**

According to Google Maps the Sheriffs station is actually 2.8 miles from the nearest primary entrance to the project, not 1.5 miles as described above. Every distance I have checked in the DEIR appears to be off my one or miles according to Google maps. Each and every distance noted in the DEIR needs to be confirmed.

4. **Average travel times for the San Marcos Station of the San Diego County Sheriff's Department to unincorporated areas of the County (such as the area of the Proposed Project) from January 1, 2012 through December 31, 2012 were: 0.7 minutes for Priority 1 calls (note: only one Priority 1 call to unincorporated County areas occurred in this time period, and the responding officer was already on scene before the call was received), 19.2 minutes for Priority 2 calls, 24.8 minutes for Priority 3 calls and 51.7 minutes for Priority 4 calls. This includes specific areas both more urban and more rural than the Project site.**

Since the nearest Sherriffs station is approximately the same distance away as the nearest San Marcos fire station, how will the Sherriff provide a faster response time than fire? I suspect that they will have the same, if not longer, response times and believe further study is needed. In addition, studies show that with more population density comes additional crime and fire risk. I see in the report that it will take the Sherriff's department just under 20 minutes to respond to

any call – the note about response times on the priority 1 call are irrelevant per statements made in the report showing that the officer was already on-site of the call.

Grading

1. The proposed blast areas seem to be very close and down slope of existing homes. In particular the Neighborhood 3 blast area appears to be right up to a neighboring property line. What studies have been performed to ensure that these blasts do not disrupt existing properties above them?
2. The grading plan shows extensive grading activities very near or adjacent to existing Eden Valley homes. I do not see how Integral will be able to keep dust and airborne particulate from entering our homes and coating our properties in dust. Yes, they state that they will be watering the project throughout grading operations, but we have already witnessed how little this does in controlling dust with the development of Harmony Grove Village. Additional dust mitigation measures should be studied to ensure existing home owners living adjacent to or near the project site are not affected.
3. The proposed project will require an extensive amount of grading to occur, yet states that the project follows the natural contours of the existing land forms. If this statement were true, less grading would be required. I see an extensive use of retaining walls, steep grades, and cut and fill operations in this grading plan and think that the project plan should be re-evaluated to require less extensive grading and use of retaining walls.

Air Quality

PSD2013-SP-13-001-DEIR-Chap2.2-Air-Quality.pdf

1. “The annual average temperature in the Project area is approximately 55 degrees Fahrenheit (°F) during the winter and approximately 74°F during the summer. Total precipitation in the Project area averages approximately 16.2 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer (Western Regional Climate Center 2012). “

The above statement appears to be grossly inaccurate for Eden Valley. The valley is typically 10 degrees warmer than Escondido and San Marcos in the summer and 10 degrees cooler than those areas on average in the winter. As this is a valley it tends to trap warm air in the summer and cold air settles in during the winter. The rainfall averages are also grossly inaccurate; the US Climate Data shows it as being 10.6” for Escondido. According to US Climate Data the temperatures and average rainfall numbers are:



Climate Escondido - California

°C | °F

	Jan	Feb	Mar	Apr	May	Jun
Average high in °F:	69	69	71	75	78	82
Average low in °F:	43	45	47	51	55	58
Av. precipitation in inch:	3.03	3.43	2.64	1.14	0.24	0.12
Days with precipitation:	-	-	-	-	-	-
Hours of sunshine:	-	-	-	-	-	-

	Jul	Aug	Sep	Oct	Nov	Dec
Average high in °F:	87	89	87	81	74	68
Average low in °F:	62	63	62	55	48	42
Av. precipitation in inch:	0.08	0.08	0.2	0.71	1.18	2.13
Days with precipitation:	-	-	-	-	-	-
Hours of sunshine:	-	-	-	-	-	-

Escondido weather averages

Annual high temperature:	77.5°F
Annual low temperature:	52.6°F
Average temperature:	65.05°F
Average annual precipitation - rainfall:	14.98 inch
Days per year with precipitation - rainfall:	-
Annual hours of sunshine:	-
Av. annual snowfall:	-



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[Escondido Climate Graph - California Climate Chart](#)

According to Escondido.org the weather is:

Weather

Escondido generally has warmer summers and cooler winters than the coast due to city's location.

Temperatures vary from an average of 56° in December to an average of 76° in August, with annual average rainfall of 15.2 inches and 263 sunny days per year. Escondido's climate is mild enough to allow cultivation of avocados, grapes, and oranges.



Average Temperatures & Precipitation

Information provided by the [Western Regional Climate Center](#).
For additional information, see [Comparative Data for Western States](#).

▼ Period of Record: 1979 - 2010

Month	Average Max. Temp. (F)	Average Min. Temp (F)	Average Total Precipitation
January	68.8°	43.0°	3.15"
February	69.2°	44.4°	3.54"
March	70.4°	47.1°	2.74"
April	74.6°	50.3°	1.14"
May	76.8°	54.6°	0.25"
June	82.2°	58.1°	0.13"
July	87.4°	62.0°	0.08"
August	88.7°	63.3°	0.08"
September	86.6°	61.2°	0.21"
October	80.2°	55.1°	0.63"
November	73.5°	46.5°	1.26"
December	69.1°	41.7°	1.60"
Annual	77.3°	52.3°	14.81"

► Period of Record: 1900 - 1979

The weather statements for the area need to be re-evaluated.

In conclusion, Integral Communities has done little to integrate their project into the existing communities of Eden Valley and Harmony Grove. They are simply going for the highest density possible without considering the safety of the residents who will occupy their project or the safety of those in the surrounding communities. They have also completely disregarded the visual impacts that this project will have on the local area. In my review of the DEIR, there appears to be a large amount of inaccurate and misleading data presented and I feel that the entire DEIR needs to be re-studied. I encourage the County of San Diego Planning & Development Services department to deny this EIR and request that Integral Communities take a more serious review of the impacts that their project will have. In addition, I feel that Integral Communities should be encouraged to work more closely with the communities surrounding the proposed area should they decide to move ahead with a new, less dense, plan.

Regards,
Bill Osborn
2952 Milpas Drive
Eden Valley, CA 92029

Ehsan, Beth

From: Kathryn Osborn <kathrynrosborn@gmail.com>
Sent: Monday, June 15, 2015 12:16 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; edenvalleynews@aol.com
Subject: Valiano Draft Environmental Impact Report

Dear Ms. Ehsan:

My name is Kathryn Osborn and I've lived on Milpas Drive in Eden Valley for 3 years.

As you know, the Valiano project, as proposed, threatens to destroy the wonderful community I am a 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 my Community.

The main concerns I have relate to significant and unmitigable impacts for Aesthetics and Transportation/Traffic that will affect me personally daily.

Aesthetics - The project will be introducing elements that drastically change the aesthetics and visual character of my community in a permanent and significant way. None of the following will blend in with the existing character of ranch-style homes built in the existing topography of rolling hills:

- Extensive grading resulting in retaining walls, berms and manufactured slopes
- Two-story houses on graded pads
- The clustered nature of the development with very high density housing scattered around the project area.

I work from home and am in Eden Valley much of my time. These changes will remove the rural, natural view I have from my home and replace it with graded land, dense housing and lights.

Transportation/ Traffic - According to the DEIR, the project will have significant and unavoidable traffic impacts and no way to mitigate these impacts.

With the huge increase in traffic on Country Club, I worry that it will be very difficult to turn onto Country Club from Milpas. It could add minutes to every trip I make and make it dangerous to turn left off of my road in rush hour.

The intersection of Country Club and Auto Park Way is already majorly congested. Rush hour traffic backs up from the light at Mission and Auto Park Way to Country Club so that those wanting to turn left have to wait through multiple cycles of the light. What's going to happen when all the houses from HGV and Valiano go in? This is an unacceptable, unmitigated impact.

In conclusion, this project does not meet our community character and will make any trips I take more dangerous. I urge the developer to modify their plan and follow the vision of the General Plan and that of my Community.

Sincerely,
Kathryn Osborn