



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

June 20, 2013

To: Reviewing Agencies

Re: Valiano
SCH# 2013061042

Attached for your review and comment is the Notice of Preparation (NOP) for the Valiano draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Beth Ehsan
San Diego County
5510 Overland Ave. Suite 110
San Diego, CA 92123

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2013061042
Project Title Valiano
Lead Agency San Diego County

Type **NOP** Notice of Preparation
Description The project would require a General Plan Amendment to change the designation to Semi-Rural 0.5 (SR-0.5). The site contains one home to be removed and a historic barn to remain. The property is currently zoned A70 with minimum lots sizes of 1 and 2 acres. A Rezone would be required to reduce the minimum lot size and change the A70 areas to RS. A Specific Plan and Site Plan would establish setbacks, etc, which will vary across the five proposed neighborhoods.

Lead Agency Contact

Name Beth Ehsan
Agency San Diego County
Phone 858 694 3103 **Fax**
email
Address 5510 Overland Ave. Suite 110
City San Diego **State** CA **Zip** 92123

Project Location

County San Diego
City San Marcos, Escondido
Region
Cross Streets Mount Whitney Road and Country Club Drive
Lat / Long 33° 6' 57" N / 117° 8' 11" W
Parcel No. 232-013-01 - 03, 232-020-55, 232-492-01, 232-500-18 - 23, 235-031-41
Township 12S **Range** 2W **Section** 19 **Base** SBB&M

Proximity to:

Highways Hwy 78, 15
Airports No
Railways Sprinter line
Waterways Escondido Creek, San Marcos Creek
Schools 14
Land Use Semi-Rural Regional Category, Semi-Rural 1 (SR-1) and Semi-Rural 2 (SR-2) Land Use Designation, A70 Zoning

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9

Date Received 06/20/2013 **Start of Review** 06/20/2013 **End of Review** 07/19/2013

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

20113061042

Project Title: Valiano

Lead Agency: County of San Diego, Planning & Development Services
Mailing Address: 5510 Overland Ave. Suite 110
City: San Diego Zip: 92123
Contact Person: Beth Ehsan
Phone: 858-694-3103
County: San Diego

Project Location: County: San Diego City/Nearest Community: San Marcos/Escondido/Eden Valley
Cross Streets: Mount Whitney Road and Country Club Drive Zip Code: 92029
Lat. / Long.: 33° 6' 57" N/ 117° 8' 11" W Total Acres: 209.3
Assessor's Parcel No.: 232-013-01 - 03, 232-020-55, 232-492-01, Section: 19 Twp.: 12S Range: 2W Base: SBB&M
232-500-18 - 23, 235-031-41
Within 2 Miles: State Hwy #: 78, 15 Waterways: Escondido Creek, San Marcos Creek
Airports: none Railways: Sprinter line Schools: 14

Document Type:

CEQA: [X] NOP [] Draft EIR NEPA: [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other
[] Mit Neg Dec Other [] FONSI

Local Action Type:

[] General Plan Update [X] Specific Plan [X] Rezone [] Annexation
[X] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [X] Site Plan [X] Land Division (Subdivision, etc.) [] Other

Development Type:

[X] Residential: Units 362 Acres 209 [] Water Facilities: Type MGD
[] Office: Sq.ft. Acres Employees [] Transportation: Type
[] Commercial: Sq.ft. Acres Employees [] Mining: Mineral
[] Industrial: Sq.ft. Acres Employees [] Power: Type MW
[] Educational [] Waste Treatment: Type MGD
[X] Recreational park, trails, equestrian staging area [] Hazardous Waste: Type
[] Other:

Project Issues Discussed in Document:

[X] Aesthetic/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [] Schools/Universities [X] Water Quality
[X] Air Quality [X] Forest Land/Fire Hazard [] Septic Systems [] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [] Minerals [X] Soil Erosion/Compaction/Grading [X] Wildlife
[] Coastal Zone [X] Noise [] Solid Waste [X] Growth Inducing
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Land Use
[] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [X] Cumulative Effects
[] Other

Present Land Use/Zoning/General Plan Designation:

Semi-Rural Regional Category, Semi-Rural 1 (SR-1) and Semi-Rural 2 (SR-2) Land Use Designation, A70 Zoning

Project Description: (please use a separate page if necessary)

The project would require a General Plan Amendment to change the designation to Semi-Rural 0.5 (SR-0.5). The site contains one home to be removed and a historic barn to remain. The property is currently zoned A70 with minimum lots sizes of 1 and 2 acres. A Rezone would be required to reduce the minimum lot size and change the A70 areas to RS. A Specific Plan and Site Plan would establish setbacks, etc, which will vary across the five proposed neighborhoods.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

- | | |
|---|---|
| <input type="checkbox"/> Air Resources Board | <input type="checkbox"/> Office of Emergency Services |
| <input type="checkbox"/> Boating & Waterways, Department of | <input type="checkbox"/> Office of Historic Preservation |
| <input type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Office of Public School Construction |
| <input type="checkbox"/> CalFire | <input type="checkbox"/> Parks & Recreation |
| <input type="checkbox"/> Caltrans District # _____ | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input type="checkbox"/> Caltrans Division of Aeronautics | <input type="checkbox"/> Public Utilities Commission |
| <input type="checkbox"/> Caltrans Planning (Headquarters) | <input type="checkbox"/> Regional WQCB # _____ |
| <input type="checkbox"/> Central Valley Flood Protection Board | <input type="checkbox"/> Resources Agency |
| <input type="checkbox"/> Coachella Valley Mountains Conservancy | <input type="checkbox"/> S.F. Bay Conservation & Development Commission |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers and Mtns Conservancy |
| <input type="checkbox"/> Colorado River Board | <input type="checkbox"/> San Joaquin River Conservancy |
| <input type="checkbox"/> Conservation, Department of | <input type="checkbox"/> Santa Monica Mountains Conservancy |
| <input type="checkbox"/> Corrections, Department of | <input type="checkbox"/> State Lands Commission |
| <input type="checkbox"/> Delta Protection Commission | <input type="checkbox"/> SWRCB: Clean Water Grants |
| <input type="checkbox"/> Education, Department of | <input checked="" type="checkbox"/> SWRCB: Water Quality |
| <input type="checkbox"/> Energy Commission | <input type="checkbox"/> SWRCB: Water Rights |
| <input checked="" type="checkbox"/> Fish & Game Region # 5 | <input type="checkbox"/> Tahoe Regional Planning Agency |
| <input type="checkbox"/> Food & Agriculture, Department of | <input type="checkbox"/> Toxic Substances Control, Department of |
| <input type="checkbox"/> General Services, Department of | <input type="checkbox"/> Water Resources, Department of |
| <input type="checkbox"/> Health Services, Department of | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Housing & Community Development | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Integrated Waste Management Board | |
| <input type="checkbox"/> Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date June 20, 2013 Ending Date July 19, 2013

Lead Agency (Complete if applicable):

Consulting Firm: _____	Applicant: _____
Address: _____	Address: _____
City/State/Zip: _____	City/State/Zip: _____
Contact: _____	Phone: _____
Phone: _____	

Signature of Lead Agency Representative: Beth Elson Date: 6/17/13

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

June 26, 2013

Ms. Beth Ehsan, Project Planner

**County of San Diego Department of Planning and
Development Services**

5510 Overland Avenue, Suite 110
SAN DIEGO, CA 92123

RE: SCH# 2013061042 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the “**Valiano Project; (to REOne to RS, reducing lot size)**” located in the San Marcos-Escondido-Eden valley areas; San Diego County, California

Dear Ms. Ehsan:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required: This project is also subject to California Government Code Section 65352.3, *et seq.*

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this

be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

Contact has been made to the Native American Heritage Commission for a Sacred Lands File Check. A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed activity might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.

Also, CEQA Guidelines Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,



Dave Singleton
Program Analyst
(916) 653-6251

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
San Diego County
June 26, 2013**

Pala Band of Mission Indians
Historic Preservation Office/Shasta Gaughen
35008 Pala Temecula Road, Luiseno
Pala, CA 92059 Cupeno
PMB 50
(760) 891-3515
sgaughen@palatribe.com
(760) 742-3189 Fax

Pauma & Yuima Reservation
Randall Majel, Chairperson
P.O. Box 369 Luiseno
Pauma Valley CA 92061
paumareservation@aol.com
(760) 742-1289
(760) 742-3422 Fax

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resources Manager
P.O. Box 1477 Luiseno
Temecula, CA 92593
(951) 770-8100
pmacarro@pechanga-nsn.
gov
(951) 506-9491 Fax

Rincon Band of Mission Indians
Vincent Whipple, Tribal Historic Preservation Officer
1 West Tribal Road Luiseno
Valley Center, CA 92082
jmurphy@rincontribe.org
(760) 297-2635
(760) 297-2639 Fax

Pauma Valley Band of Luiseño Indians
Bennae Calac
P.O. Box 369 Luiseno
Pauma Valley CA 92061
bennaecalac@aol.com
(760) 617-2872
(760) 742-3422 - FAX

Rincon Band of Mission Indians
Bo Mazzetti, Chairperson
1 West Tribal Road Luiseno
Valley Center, CA 92082
bomazzetti@aol.com
(760) 749-1051
(760) 749-8901 Fax

San Luis Rey Band of Mission Indians
Cultural Department
1889 Sunset Drive Luiseno
Vista, CA 92081 Cupeno
760-724-8505

760-724-2172 - fax

La Jolla Band of Mission Indians
Lavonne Peck, Chairwoman
22000 Highway 76 Luiseno
Pauma Valley CA 92061
rob.roy@lajolla-nsn.gov
(760) 742-3796
(760) 742-1704 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013061042; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Vallano Project; located in portions of the cities of San Marcos and Escondido and the Eden Valley; San Diego County, California.

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059

760-891-3510 Office | 760-742-3189 Fax



July 17, 2013

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

RE: Notice of Preparation of an EIR, PDS2013-SP-13-001, Log No. ER-13-18-002; Valiano

Dear Ms. Ehsan,

Our office is in receipt of the Notice of Preparation for the project referenced above. This letter constitutes our initial response on behalf of Robert Smith, Chairman of the Pala Band of Mission Indians.

The project as described sits on the boundary of the area that the Pala Band considers to be part of its Traditional Use Area. Ordinarily we would defer comment to tribes in closer proximity to the project. However, because the CEQA Initial Study included in the Notice finds that there may be Potentially Significant Impacts to cultural resources and that a number of archaeological resources have been identified within a mile radius of the site, we felt it was important to comment at this time.

We would like the County to include Native American participation – specifically, tribal monitors – in any and all surveys and site visits to assess impacts to cultural areas. We would also like the opportunity to comment on any surveys and reports generated for this project before the release of the draft EIS. In this way, we can make sure that communication occurs early and often in the process and that the environmental documents have already taken our concerns and suggestions into consideration. Early and full cooperation will ensure that there are no misunderstandings as the project moves forward, such has occurred on other nearby projects such as Meadowood. I am happy to help you identify qualified individuals to participate as tribal monitors and to continue to consult with you as the project moves forward.

Please feel free to contact me with any questions or concerns at sgaughen@palatribe.com.

Sincerely,

Shasta C. Gaughen, PhD
Tribal Historic Preservation Officer



SAN PASQUAL BAND OF DIEGUEÑO MISSION INDIANS OF CALIFORNIA

SAN PASQUAL RESERVATION

TRIBAL COUNCIL

July 8, 2013

Allen E. Lawson
Chairman

Victoria Diaz
Vice-Chairman

Tilda Green
Secretary-
Treasurer

David L. Toler
Delegate

Steven Cope
Delegate

County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, California 92123

Dear Sir:

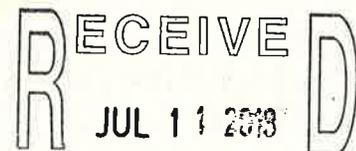
Subject: Project name: Valiano

After review of your Notice of Preparation of Environmental Impact Report we feel as if this project as proposed is overly aggressive and will have an adverse effect on the already depleted biological and native cultural sites of this region. A development of this scale is out of place.

This area is considered Ipai-Kumeyaay ancestral territory and our band has the responsibility to express ourselves when there is a proposal that has significant impact on the terrain.

Sincerely,

David L. Toler
Delegate



Planning and
Development Services



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT CORPS OF ENGINEERS
REGULATORY DIVISION, SOUTH COAST branch
CARLSBAD FIELD OFFICE
5900 LA PLACE COURT, SUITE 100
CARLSBAD, CALIFORNIA 92008

FED

July 11, 2013

Regulatory Division

Ms. Beth Ehsan, Project Manager
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, California 92123-1239

Dear Ms. Ehsan:

This letter is in response to your request, dated June 20, 2013, for our review and comments regarding the Notice of Preparation of an Environmental Impact Report for the Valiano Residential Development project (Log No. ER-13-08-002) located in the Eden Valley area of the San Dieguito Planning Community Area, between the cities of San Marcos and Escondido within unincorporated San Diego County, California (Corps File Number SPL-2013-00455-MBS).

We have reviewed the above cited project information with respect to the Army Corps of Engineers' (Corps) authority to issue Department of the Army (DA) permits pursuant to section 10 of the Rivers and Harbors Act (33 U.S.C. 403) and section 404 of the Clean Water Act (33 U.S.C. 1344). It appears potential waters of the U.S. are present within the project area. The Corps recommends that the proposed project be designed to first avoid, and then minimize impacts to waters of the U.S. to the maximum extent practicable. Please note that a DA permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material other than incidental fallback within, "waters of the United States", including wetlands and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to the following activities:

- a. Creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;
- b. Mechanized land clearing and grading which involve filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the U.S.;
- c. Allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the U.S.; and

d. Placing pilings when such placement has or would have the effect of a discharge of fill material.

An application for a DA permit is available on our website: <http://www.usace.army.mil/Portals/2/docs/civilworks/permitapplication.pdf>. If you have any questions, please contact me at 760-602-4836 or via e-mail at Meris.Bantilan-Smith@usace.army.mil. Please refer to this letter and SPL-2013-00455-MBS in your reply.

“Building Strong and Taking Care of People”

Sincerely,



Meris Bantilan-Smith
Senior Project Manager
South Coast Branch



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. I
CHARLTON

STATE

July 18, 2013

Ms. Beth Ehsan
Department of Planning and Land Use, County of San Diego
5510 Overland Ave. Suite 110
San Diego, CA 92123
beth.ehsan@sdcounty.ca.gov

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Valiano Project, County of San Diego, CA (SCH# 2013061042)

Dear Ms. Ehsan:

The California Department of Fish and Wildlife (Department) has reviewed the Notice of Preparation (NOP) for the Valiano Project draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program (DFG Code Section 2800, et. seq.). The County of San Diego (County) participates in the NCCP program by implementing the County's Multiple Species Conservation Program (MSCP). The proposed project is located within the boundaries of the draft North County MSCP Subarea Plan (SAP) within the County in California.

The proposed project includes 12 parcels (209.3 acres) located north of Mount Whitney Road and west of Country Club/Harmony Grove Drive in the Eden Valley portion of the San Dieguito Community Planning Area of unincorporated San Diego County. The project consists of a private gated residential development of 362 residential lots, 17 open space lots, and easements of 109 acres, with preservation of both agriculture and native habitats. Proposed minimum lot size ranges from 4,500 square feet in Neighborhood 1 to 7,000 square feet in Neighborhoods 2 and 3. Typical surrounding lot sizes are 2 to 4 acres to the west and 1 acre to the east. To the northeast are mobile home parks and to the north across La Moree are 5,000 square foot lots. To the south is the Harmony Grove Village Specific Plan, Planning Area 3, which is planned for a density of just over one dwelling unit per acre and lot sizes of approximately one-half acre. The Village boundary is located about one-quarter mile south of nearby neighborhoods, and adjoins the southwestern edge of another neighborhood. As proposed, the project site would be accessed from Hill Valley Drive, Mount Whitney Road, and Country Club Drive. Consequently, offsite improvements on Country Club Drive may be required. Proposed grading is 700,000 cubic yards of balanced cut and fill (average 3,500 cubic yards per acre). The project would also include public multi-use trails, smaller private trails, an equestrian staging area and park land. Water service would be provided by the Rincon del Diablo Municipal Water District; the preferred option for sewer service is a wastewater treatment plant operated by the County Sanitation District. If the Vallecitos Municipal Water District sewer

option is selected, an offsite sewer line extension would be required. The proposed fire service provider is the San Marcos Fire Protection District.

The Department offers the following comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating project related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts.

Specific Comments

1. Habitat, including coastal sage scrub (CSS), will likely be impacted by the project. Therefore, the DEIR should discuss how loss of coastal sage scrub will be mitigated. If impacts to CSS are proposed, the County would need to issue a habitat loss permit (HLP) for the project. Wildlife Agency (U.S. Fish and Wildlife Service [Service] and Department) are required to review and approve HLPs. For projects requiring HLPs, we recommend that mitigation for CSS occur in the same planning unit (Harmony Grove) as the proposed impacts. The DEIR should recommend the appropriate steps to initiate the process for acquiring a 4 (d) interim Habitat Loss Permit from the Wildlife Agencies for any impacts to CSS. Projects that result in impacts to sensitive habitat should also provide adequate mitigation following the North County draft SAP and ensure adequate funding for long term management of the mitigation site.
2. The project site is located north and/or adjacent to the Harmony Grove development project, which was recently approved by the County (and required a HLP) and is currently under construction. The Harmony Grove development project includes on-site as well as off-site mitigation locations for upland and wetland impacts from that project. In some areas, the proposed Valiano project would be located immediately adjacent or in proximity to on-site mitigation areas for the Harmony Grove development project. The DEIR should analyze and demonstrate that the proposed Valiano development project would not result in any direct or indirect impacts to the mitigation areas located on the adjacent Harmony Grove development project.
3. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants and wildlife, we recommend the DEIR include a complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas. The DEIR should include any analysis of impacts to biological resources from any required services (e.g., fire, sewer, water, drainage, etc.) that would be required for the project. All areas on- and off-site needed for fuel clearing and fire access, water purveyance, sewerage treatment (including any secondary or tertiary leach field or spreading areas), and drainage should avoid/minimize impacts to biological resources to the extent practicable. Impacts associated with these services should be contained within the development footprint. Where impacts from construction, and operation and maintenance of these services/facilities are unavoidable, then appropriate mitigation should be identified in the DEIR. As indicated above, we recommend that all biological impacts from the project be mitigated within the same North County MSCP planning unit as the proposed project (No. 11, Harmony Grove). The intent is to identify all potential immediate and long-term impacts related to providing fire access and other necessary services for the project upfront, so areas identified for

mitigation/open space are not later subject to additional impacts from required project services.

4. It is also the policy of the Department to strongly emphasize avoidance and minimization of impacts to jurisdictional wetland resources, including the conversion of wetlands to uplands. Where unavoidable impacts to wetlands are proposed, the Department requires a "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Based on review of information provided with the NOP, it appears that the project site may support aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be prepared and the results summarized and included in the DEIR. The delineation should be conducted pursuant to the Service wetland definition adopted by the Department.¹ Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers. The DEIR should fully analyze all potential direct and indirect impacts to wetland resources, including the identification of feasible mitigation measures to adequately compensate for any unavoidable impacts. Where mature riparian areas and/or movement corridors are proposed to be impacted, the mitigation identified in the DEIR must compensate for the loss of function and value of that which is impacted. Replacing the functions and values of mature riparian areas typically can take a substantial amount of time and resources; therefore, we recommend that these areas be avoided with a minimum 100-foot buffer, unless it is clearly demonstrated that there is no other feasible alternative.

5. The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the County's Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.²

¹ Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

² A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

6. The DEIR should fully discuss the project's consistency with existing regional conservation planning efforts within the project area. These existing efforts include the North County MSCP draft SAP which is located within planning unit 11 (Harmony Grove) in the County. The Department recommends that any proposal to change, expand or develop new or more intense uses in the project area be evaluated for consistency with the conservation planning efforts that occur in the project area. For example, proposed development on this and other properties within the planning area may have a direct/indirect and/or cumulative effect on sensitive species, habitats, and wildlife movement.
 7. The Department recommends the DEIR include a range of feasible alternatives (including the placement of buildings and landscaping) to ensure that alternatives to the proposed project are fully considered and evaluated and the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.
 8. Native plants (endemic to the local area) should be used to the greatest extent feasible in landscaped areas adjacent to and/or near mitigation/open space areas and/or wetland/riparian areas. The applicant should not plant, seed, or otherwise introduce invasive exotic plant species to landscaped areas adjacent and /or near native habitat areas. The California Invasive Plant Council provides a list of exotic plants species (Invasive Plant Inventory [Cal-IPC; <http://www.cal-ipc.org/>]), which should be avoided in landscaped areas, included, but not limited to: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, and French broom.
 9. It is anticipated that the proposed project would result in increased traffic volumes on highways and roads adjacent to the proposed project area. The DEIR should discuss any direct and indirect impacts associated with the need to construct and maintain any road improvements required to off-set increased traffic volumes resulting from the proposed project. As part of the analysis, the DEIR should identify any on- and/or off-site impacts to sensitive species or habitats (including wetlands/vernal pools) that would result from any proposed road improvements associated with the project.
 10. The proposed project would create a significant amount of earthwork/grading and other ground disturbances. The DEIR should analyze the impacts that the project will have on storm water quality and general hydrology in the surrounding area. The DEIR should analyze the efficacy of Low Impact Development options to minimize storm water impacts including: site layout with regard to sensitive resources and off-site native habitat; and the use of pervious surfaces (crushed aggregate, turf block, unit pavers, pervious concrete and asphalt) as alternatives to impervious surfaces.
-

General Comments

1. The Department considers adverse impacts to a species protected by the CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085.) Consequently, if the project, project construction, or any project-related activity during the life of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

Biological Resources within the Project's Area of Potential Effect

2. The DEIR should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. The DEIR should include the following information.
 - a. Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis should be placed on resources that are rare or unique to the region.
 - b. A thorough assessment of rare plants and rare natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see: <http://www.wildlife.ca.gov/habcon/plant/>) (hard copy available on request).
 - c. A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 322-2493 or www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
 - d. An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, §15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted

at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Service and the Department.

Analyses of the Potential Project-Related Impacts on the Biological Resources

3. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.
 - a. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
 - b. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
 - c. A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

4. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
5. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
6. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their

active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs.

Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

7. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
8. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on the referenced NOP for the County. Questions regarding this letter and further coordination on these issues should be directed to Bryand Duke at (858) 637-5511, Bryand.Duke@wildlife.ca.gov or Randy Rodriguez at (858) 467-4201, Randy.Rodriguez@wildlife.ca.gov.

Sincerely,



Betty Courtney
Environmental Program Manager
South Coast Region

cc: Michael Moreno, U.S. Fish and Wildlife Service
Scott Morgan, State Clearinghouse
Gail Sevrens, CDFW
David Mayer, CDFW

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST, M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-6960

FAX (619) 688-4299

TTY 711

www.dot.ca.gov

*Flex your power!
Be energy efficient!*

July 8, 2013

11-SD-78
PM 15.48
Valiano NOP
SCH 2013061042Ms. Beth Ehsan
County of San Diego Planning
5510 Overland Ave. Suite 110
San Diego, CA 92123

Dear Ms. Ehsan:

The California Department of Transportation (Caltrans) has reviewed the Notice of Preparation (NOP) for the Valiano project near State Route 78 (SR-78). Caltrans has the following comments:

Traffic Study

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures. The study should use as a guideline the *Caltrans Guide for the Preparation of Traffic Impact Studies*. Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide.

The Level of Service (LOS) for operating State highway facilities is based upon Measures of Effectiveness (MOE) identified in the Highway Capacity Manual (HCM). Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" on State highway facilities; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than this target LOS, the existing MOE should be maintained. In general, the region-wide goal for an acceptable LOS on all freeways, roadway segments, and intersections is "D". For undeveloped or not densely developed locations, the goal may be to achieve LOS "C".

All State-owned signalized intersections affected by this project should be analyzed using the intersecting lane vehicle (ILV) procedure from the Caltrans Highway Design Manual, Topic 406, page 400-21.

The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.

A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacities. A focused analysis may also be necessary if there is an increased risk of a potential traffic accident.

All freeway entrance and exit ramps where a proposed project will add a significant number of peak-hour trips that may cause any traffic queues to exceed storage capacities should be analyzed. If ramp metering is to occur, a ramp queue analysis for all nearby Caltrans metered on-ramps is required to identify the delay to motorists using the on-ramps and the storage necessary to accommodate the queuing. The effects of ramp metering should be analyzed in the traffic study. For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

The data used in the TIS should not be more than 2 years old.

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

The lead agency should monitor impacts to insure that roadway segments and intersections remain at an acceptable LOS. Should the LOS reach unacceptable levels, the lead agency should delay the issuance of building permits for any project until the appropriate impact mitigation is implemented.

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

If you have any questions, please contact Roger Sanchez-Rangel of the Development Review branch at (619) 688-6494.

Sincerely,



JACOB ARMSTRONG, Branch Chief
Development Review Branch

Ehsan, Beth

LOCAL

From: Barbara Redlitz <Bredlitz@ci.escondido.ca.us>
Sent: Tuesday, July 30, 2013 3:00 PM
To: Ehsan, Beth
Cc: Ed Domingue; Jay Petrek; Paul Keck
Subject: RE: County Referral - Valiano

Hi Beth,

Thanks for the quick response. In the interest of time, I am forwarding our brief comments via this email.

1. The project is inconsistent with the Estate I land use designation of the City's General Plan, yet it proposes densities typical of an urban development with full services. Since all of the project is within the City of Escondido's General Plan area, and the northern portion is within the Escondido Sphere of Influence, the EIR should include analysis of the Escondido General Plan policies, particularly regarding land use and circulation. The document should clarify whether an amendment to the Escondido Sphere of Influence (SOI) to detach the property from the City's SOI is included as part of the requested actions along with analysis of such an amendment.
2. The project proposes a package plant for wastewater treatment. Such facilities are difficult and costly to maintain. The City is concerned that the maintenance obligations will result in a future request for connection to City services for development that exceeds the anticipated densities under the City's recently adopted General Plan; any such connection would require costly improvements and upgrades to the City's facilities and collection system. The project should include adequate and enforceable measures for the ongoing management and funding of these maintenance responsibilities in perpetuity.
3. The project will introduce additional traffic affecting the City's circulation system. The traffic analysis should evaluate impacts to the City's circulation system pursuant to the City's Environmental Quality Regulations: <http://www.escondido.org/planning.aspx>

Thank you for the opportunity to review the NOP. We look forward to receiving a copy of the Draft EIR when available.

Regards,

Barbara J. Redlitz, AICP
Director of Community Development
201 North Broadway
Escondido, CA 92025
(760) 839-4546 phone
(760) 839-4313 fax

bredlitz@escondido.org

From: Ehsan, Beth [<mailto:Beth.Ehsan@sdcounty.ca.gov>]
Sent: Monday, July 29, 2013 2:19 PM
To: Barbara Redlitz
Subject: RE: County Referral - Valiano

Hi Barbara,

Attached is the Tentative Map. The location map is on our website at <http://www.sdcounty.ca.gov/pds/ceqa/SP-13-001.html>.

Note that the comment period ended on July 19th and we are reading through the comments now, so please get your comments in as soon as you can.

Thanks,
Beth

From: Barbara Redlitz [<mailto:Bredlitz@ci.escondido.ca.us>]

Sent: Monday, July 29, 2013 11:14 AM

To: Ehsan, Beth

Subject: County Referral - Valiano

Hi Beth,

We received a copy of the NOP for this project. Can you please forward a location map and copy of the tentative map?

Thank you.

Barbara J. Redlitz, AICP
Director of Community Development
201 North Broadway
Escondido, CA 92025
(760) 839-4546 phone
(760) 839-4313 fax

bredlitz@escondido.org



VALLECITOS WATER DISTRICT

A PUBLIC AGENCY

201 Vallecitos de Oro • San Marcos, California • 92069-1453 Telephone (760) 744-0460

June 26, 2013

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

**RE: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT (EIR)
PDS2013-SP-13-001, LOG NO. ER-13-08-002; VALIANO**

General

The above referenced project is located outside of both the water and sewer service boundaries of the Vallecitos Water District (District). Annexation into the water and/or sewer service area would be required in order to obtain water and/or sewer service. After annexation, service would be provided under the rules and regulations of the District, under normal operating conditions after all required fees have been paid and all conditions of the District have been satisfied. There are no existing District pipelines located within the boundaries of the project.

The following information is provided for the water and sewer sections of the Initial Study:

XVII. UTILITIES AND SERVICE SYSTEMS

b & c. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?

As proposed, there is no impact to the Vallecitos Water District as the project is not located within the District water or sewer service boundaries. If Vallecitos Water District was to be requested to provide water and/or sewer service to the project, a water and sewer study would be required to determine if service could be provided and what impacts to District facilities could be expected. Annexation into the water and/or sewer district would be required in order to obtain water and/or sewer service.

e. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

As proposed, there is no impact to the Vallecitos Water District as the project is not located within the water service boundary of the Vallecitos Water District. If Vallecitos Water District was to be requested to provide water service to the project, a water study would be required to determine if service could be provided and what impacts to District facilities could be expected. Annexation into the water district would be required in order to obtain water service.

f. Would the project result in the determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As proposed, there is no impact to the Vallecitos Water District as the project is not located within the sewer service boundary of the Vallecitos Water District. If Vallecitos Water District was to be requested to provide sewer service to the project, a sewer study would be required to determine if service could be provided and what impacts to District facilities could be expected. Annexation into the sewer district would be required in order to obtain sewer service.

Conclusion

This project is not located within the Vallecitos Water District service boundary for either water or sewer service and the project has proposed obtaining water and sewer service elsewhere. Therefore, it is anticipated that the project, as proposed, will not have an impact on Vallecitos Water District. If, at a later date, water and/or sewer service is requested from the District, a water and sewer study would be required to determine if service could be provided and to identify any impacts to the District. Annexation into the water and/or sewer service area would be required.

This letter is issued for planning purposes only, and is not a representation, expressed or implied, that the District will provide service at a future date. The Vallecitos Water District relies one hundred percent on imported water supplies. Water may not be available at the time the project is built. Commitments to provide service are made by the District Board of Directors and are subject to compliance with District fees, charges, rules and regulations.

Valiano
PDS2013-SP-13-001
Page 3

Sincerely,

VALLECITOS WATER DISTRICT

A handwritten signature in blue ink, appearing to read "Eileen Koonce". The signature is fluid and cursive, with a large initial "E" and "K".

Eileen Koonce
Engineering Technician III

cc: Ken Gerdes, Director of Engineering and Operations
James Gumpel, Principal Engineer



Chairman

July 19, 2013

Andrew Vanderlaan
Public Member

Vice Chairman

John Ingalls
Santa Fe
Irrigation District

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

Members

Bill Horn
County Board of
Supervisors

SUBJECT: Notice of Preparation of an Environmental Impact Report
for the Valiano Project (PDS2013-ER-13-08-002;
PDS2013-TM-5575)

Dianne Jacob
County Board of
Supervisors

Bud Pocklington
South Bay
Irrigation District

Dear Ms. Ehsan,

Lori Zapf
Councilmember
City of San Diego

Thank you for allowing the San Diego LAFCO to provide comments on the above referenced project. LAFCO is responsible for encouraging the efficient provision of public services and has purview over changes to local government organization and any associated sphere of influence actions. LAFCO is generally a responsible agency for environmental review when jurisdictional changes and/or sphere of influence changes are proposed. Therefore, we offer the following comments:

Jim Janney
Mayor
City of Imperial Beach

Sam Abed
Mayor
City of Escondido

Alternate Members

Greg Cox
County Board of
Supervisors

- The proposed Valiano project territory is currently located within the service area of the Rincon del Diablo Municipal Water District (MWD) for water sewer service, and the San Marcos Fire Protection District (FPD) for fire protection services. No changes to these service arrangements are proposed.
- The project description references two options for provision of sewer services to the project area: the preferred option, involving annexation to the San Diego County Sanitation District (SD) which would operate an on-site wastewater treatment plant that would be constructed with the project; or, annexation to the Vallecitos Water District (WD) which would provide sewer service via an offsite sewer line extension to the district's sewer system.
- The proposed project area is not located within the respective service areas or adopted spheres of influence for the San Diego County SD or the Vallecitos WD. Accordingly, the project would require LAFCO approvals of an amendment to the sphere of influence and annexation to the service area for either of the agencies identified in the proposed sewer service options.

Sherri Lightner
Councilmember
City of San Diego

Jo MacKenzie
Vista Irrigation District

Lorraine Wood
Councilmember
City of Carlsbad

Harry Mathis
Public Member

Executive Officer

Michael D. Ott

Counsel

Thomas Bosworth

SUBJECT: Notice of Preparation of an Environmental Impact Report for the Valiano Project (PDS2013-ER-13-08-002; PDS2013-TM-5575)

Page 2

- Because the proposed amendments to the subject agencies' adopted spheres of influence involve a substantial amount of territory, the agencies' spheres may be subject to a sphere review, and/or a comprehensive sphere update and associated municipal service review prior to LAFCO consideration of the project's proposed jurisdictional changes.
- As the proposed project requires LAFCO approvals for changes to local governmental organization and/or adopted spheres of influence and associated municipal service reviews, the San Diego LAFCO will be a responsible agency for environmental review.
- To ensure that the Environmental Impact Report (EIR) for the Valiano project will be germane to LAFCO's responsibilities as a responsible agency, the EIR for the proposed project should include, at a minimum discussions of: all required sphere of influence and jurisdictional changes, and associated sphere of influence and municipal service reviews; identification of existing and proposed infrastructure and capacities necessary to extend municipal services to the project area; existing and proposed land use designations; identification of any adjacent disadvantaged unincorporated communities and their needs and deficiencies for fire protection, sewer, and water services; and, the project's compliance with LAFCO statutes and policies related to preservation of prime agricultural and open space lands.

Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (858) 614-7788.

Sincerely,



ROBERT BARRY, AICP
Local Governmental Analyst

RB:ra

Ehsan, Beth

From: Smith, Oliver [oliver.smith@philips.com]
Sent: Saturday, July 13, 2013 4:54 PM
To: Ehsan, Beth
Cc: J Arsivaud; Lael Montgomery
Subject: Input on DEIR for Valiano Project

NON-PROFIT

Beth,

As I noted during public speaking at the meeting DPDS held on Wednesday July 10, 2013 regarding the Valiano Project, I am concerned that the traffic study did not specifically include traffic counts and impacts due to the Harmony Grove Village project. The Harmony Grove Village project that has been approved by the county calls for 742 dwelling units and is adjacent to the Valiano project. The Harmony Grove Village project is currently being built, so needs to be included in the Valiano analysis at full build out.

I would also like to raise a concern with the high number of cul de sacs with limited overall egress points, emergency or otherwise. I realize that the requirements on a limited number of isolated homes at the end of a long access road in a rural area are different than for other property configurations, but Valiano is a large scale (362 dwelling unit) project so should by necessity be held to a higher standard.

Oliver J. Smith
Chair
Valley Center Community Planning Group

The information contained in this message may be confidential and legally protected under applicable law. The message is intended solely for the addressee(s). If you are not the intended recipient, you are hereby notified that any use, forwarding, dissemination, or reproduction of this message is strictly prohibited and may be unlawful. If you are not the intended recipient, please contact the sender by return e-mail and destroy all copies of the original message.

Ehsan, Beth

From: Doug Dill <doug.dill@att.net>
Sent: Friday, July 19, 2013 10:02 AM
To: Wardlaw, Mark
Cc: Ehsan, Beth; Loy, Maggie A; Sibbet, David
Subject: NOP comments letter for Valiano - PDS2013-SP-13-001

Mark Wardlaw, Director
Planning and Development Services
County of San Diego
5510 Overland Drive
San Diego, CA. 92123

Dear Mr. Wardlaw,

The San Dieguito Planning Group appreciates the opportunity to comment on the Notice of Preparation for the Environmental Impact Report for Valiano/Eden Hills Project; PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-STP-13-003, PDS2013-TM-5575, PDS2013-REZ-13-001, PDS2013-ER-12-08-002.

Project Alternative:

A plan that follows the Community Plan and current zoning should be included as one of the alternatives.

Project Description:

The description of the project does not describe the adjacent communities accurately or they've been left off completely. None of the communities in the unincorporated area have been mentioned (Harmony Grove and Eden Valley). Many of these adjacent communities are very rural/estate rural in nature, including the San Marcos community of Coronado Hills located immediately to the west. There are rural commercial operations (equestrian facilities) adjacent to the project site and these descriptions should be included.

Calculation for allowed density does not correspond to current zoning. This should be addressed for accuracy based on the current zoning.

Neighborhood 5 is not in the sphere of influence of Escondido.

The location of the Village Limit Line is incorrectly indicated on the maps and description.

This project is proposed to be located in a valley that is approximately 3 miles long and a mile wide. Both the communities of Eden Valley and Harmony Grove lie within the valley that is constrained by hills to the east and west that rise above the valley floor several hundred feet.

Aesthetics:

The visual impact of this proposed suburban community dropped into the middle of rural properties is significant. What is proposed to buffer these homes from the lesser dense properties? This project has significant visual impacts from every direction of the Valley and mitigation for this impact needs to be adequately addressed.

A gated community located in a rural residential community and is not consistent with character of the surrounding community.

How would the sewage treatment plant, an industrial facility, be buffered against existing and proposed residential lots?

The communities of Harmony Grove and Eden Valley are “dark skies” communities. How will the project align with this standard?

Description of the valley and elevation changes from the valley floor to the surrounding hills to the east and west should be included. This project will be visible from almost every public point on the valley. How will the project mitigate for this condition?

Agricultural:

How will the project mitigate for loss of significant agricultural acreage?

If the onsite sewage treatment plant is intended to irrigate the remaining avocado groves will the water quality (salt content) be at a level that will sustain the grove?

Air Quality:

There are several times per year that weather in this constrained valley creates a significant inversion layer trapping pollutants in the valley. How will the project address the increase in pollutants due to traffic increases and fire places in the valley as well as during the construction phase?

Will the air quality impacts be calculated on a cumulative basis with the build out of the adjacent Harmony Grove Village project in mind (742 homes)?

Located in the 2700 block of Country Club Dr. is a private child day care facility. This site qualifies as a sensitive receptor and should be addressed in the EIR.

Building of the sewage treatment plant brings three systems within a near radius of each other. What are the cumulative impacts for the addition of this plant to the neighboring plants?

Biological Resources:

The site appears to be potentially occupied by several species of concern and is part of an established regional wildlife corridor. While the project indicates that over 50% of the site will be preserved as open space, wildlife corridors appear to not exist in the proposed development pattern. The proposed development pattern should be evaluated for impact to wildlife corridors both local and migratory.

It appears to that a significant area of dedicated open space is “backyard open space”. Typically, backyard open space becomes problematic to home owners for issues of fire safety and privacy, and often loses its habitat and open space value. How will the integrity of the open space be protected with so much of it being backyard open space?

There appear to be several oak riparian/wetland areas on the project site. One such area, in neighborhood 3, is under mitigation order for previous impacts by the former property owner who illegally removed protected oak trees. The project as proposed appears to create incursions into some of these areas. This previously ordered mitigation needs to be satisfied before any additional construction, as well as study how the new construction affects this mitigation.

Cultural Resources:

The site appears to contain several significant archeological sites, including one site that may contain human remains. Should a full archeological survey be conducted of the site prior to project construction and how will these sensitive sites be properly protected in the long term?

Geology and Soils:

It appears that there may be seismic active zones in the southern end of this valley approximately a mile from the southern end of this project. This should be studied for potential impacts to proposed residences in this project that would be built on fill which could lead to significant liquefaction in a major seismic event.

Also noted in the NOP is the presence of soils with moderate or severe erodibility ratings. This may have both on site and off site impacts to proposed and existing residences.

Incidents of high water tables in heavy rains have resulted in soils liquefying under the weight of service vehicles in the past near neighborhood 3. This condition may limit the available area for development.

Greenhouse Gas Emissions:

This project is a 362 home project that is not served by transit (located over a mile from the entrance to the project) and will create over 3000 ADT's. How will the project account for the additional greenhouse gas emissions created by the additional vehicle trips in this constrained valley?

Cumulative effects from the build out of Harmony Grove Village should also be considered for the accumulative effect.

Hazards and Hazardous Materials:

A significant part of this project site has been under agricultural operations for several decades. What fertilizers and chemicals could exist in the onsite soils from this operation?

The protection for the public with a privately run sewage treatment plant should be addressed – specifically in the case of failure.

As mentioned in an earlier section, a private child day care facility exists in the 2700 block of Country Club Dr.

Hydrology and Water Quality:

It is presumed that the presence of an onsite package sewer treatment plant represents onsite use of treated/recycled water for open space and common area irrigation. This same situation will exist in the adjacent 742 home Harmony Grove Village project. The cumulative impacts of both projects should be studied as it relates to ground water quality, effects on nearby wells in the valley, and potential water quality impacts to the Escondido Creek and nearby tributaries.

The proximity of the water treatment plant is close to the Escondido Creek and its tributaries. What safety measures will be implemented to protect the creek in case of accident or breakdown of the plant?

Several upland tributaries to Escondido Creek exist on the project site. The proposed project appears to create incursions into these tributaries potentially creating water quality and hydrological issues downstream. How will the project mitigate for these impacts?

The proposed use of treated water from the treatment plant is to use for irrigation, particularly of the avocado trees. Will there be proper monitoring of the quality of this water to preserve the avocado groves (these fruit trees are very sensitive to sodium and treated water typically is heavy with sodium)?

Land Use and Planning:

The communities of Harmony Grove and Eden Valley engaged PDS over ten years ago in an intensive planning process in which the layout of Harmony Grove Village (742 homes) was designed, cooperatively, to limit suburban and urban densities beyond the Village Limit Line created by the Harmony Grove Village project and was resoundingly supported by not only PDS but the Board of Supervisors as well. This project represents a distinct departure from that plan. How will this affect future community relations with DPS in the area of planning and land use?

The rural versus suburban representative balance is in jeopardy with clustering of this project. How will this be mitigated to maintain this important representative balance?

Noise:

The properties in the existing community are large agricultural and equestrian properties. The impacts during construction will significantly impact the animals and these operations. How will the applicant assist the neighbors to protect their animals and the safety of those using these animals?

Public Services/Safety:

Fire and emergency routes need to be carefully studied and created, especially for Area 5, which is isolated from the emergency routes of the remainder of the project.

The fire buffer between the sensitive impact areas and the development of the houses has not been addressed. How will they protect these homes from fire?

Transportation/Traffic:

Cumulative impacts to traffic that include the development of this project will be significant. Downgrading of Country Club Drive, Harmony Grove Road, Elfin Forest Road in the Circulation Element, the double-tracking of the Sprinter line at Mission Road and Nordahl Rd., and the long term delay of the extension of Citracado Parkway will impact the traffic patterns and all these circumstances need to be included in the traffic studies with mitigation and infrastructure steps be developed.

Traffic impacts should be studied on a cumulative basis, including anticipated traffic from the adjacent Harmony Grove Village project (742 homes).

Sincerely,

Douglas Dill
Vice-Chair/Seat 15
San Dieguito Planning Group

**FRIENDS OF EDEN VALLEY FOR
RESPONSIBLE DEVELOPMENT**

www.FriendsOfEdenValley.com

July 19, 2013

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

Re: Response to Notice of Preparation (NOP) for EIR 13-08-002.

Dear Ms. Ehsan:

Thank you for giving *Friends of Eden Valley for Responsible Development (FEV)* an opportunity to comment on the Notice of Preparation request for a 362-Unit residential subdivision. The Eden Valley Community, north of Harmony Grove, is a rural residential character with large lots and equestrian uses. The population of Harmony Grove is expected to increase dramatically as the Harmony Grove Village development pattern is built out. Eden Valley and Harmony Grove is concerned about the ability to keep its rural voice.

Currently, there is continual pressure to put higher density residential in this area beyond what is allowed by the General Plan Land Use Map. Several non-resident land speculators have purchased local undeveloped land in the hopes that General Plan Amendments allowing higher density will be adopted by the Board of Supervisors. Residents will continue to work to preserve this historic 100-year-old community by implementing the Village Development Pattern that was negotiated with County Staff and approved by the BOS in August 2011. *FEV* are not opposed to growth consistent with the existing General Plan. However, development proposed that would involve a higher density than the approved General Plan is not supported, and would be a significant impact to the community.

In preparation of the Environmental Impact Report for the project identified above, please consider the following areas of concern in the environmental review document:

Project Alternative:

Please consider an alternative project plan that considers what could be done without a GPA. A plan that follows the current General Plan, zoning and community plan could reduce land use impacts, and would eliminate much of the widespread opposition from the local residents and other groups. We request an analysis to determine the current maximum number of dwellings possible under the current General Plan, and that be considered as an alternative project.

Project Description:

The project description provided in the NOP is inaccurate. It references mobile homes parks and 5,000 square foot lots off La Moree Drive that are not directly adjacent to the site, and the project site does not provide any access to those features off La Moree Drive. Rather, land uses directly adjacent to the project site are low-density at one and two lot minimum in most instances, which large animal keeping and agricultural usage. The proposed neighborhoods 1-4 are within the community of Eden Valley, which is situated in a north-south running valley, along the base of the Coronado Hills to the west, and intersecting Harmony Grove to the south. Eden Valley is nestled between the cities of Escondido and San Marcos, and is within the City of Escondido's sphere of influence boundaries. This small valley is isolated by the topography of the surrounding hills, and is rural and equestrian in character with 1 and 2 acre minimum lots. A two lane, tree lined street is the only access to Eden Valley. Residents here value open space, quiet, dark nighttime skies, low traffic volume, equestrian trails and access to the abundant wildlife that flourishes in this beautiful rural environment lending to it's name...Eden Valley.

Landform/Aesthetics:

The amount of landform modification for the proposed hillside lots on the western portion of the subdivision should be reduced. Lot layout should conform with the natural terrain. Slopes should typically be graded at a 2:1 ratio, and undulated to give a natural appearance. All slopes should be landscaped with a mixture of trees, shrubs, and ground cover PRIOR to occupancy of the first building. Residences should be architecturally compatible with each other and the surrounding neighborhood.

This valley has multiple existing creek tributaries to the Escondido Creek starting at TWO locations at the North end of the Eden Valley located near Hill Valley Drive. Both of those tributaries wander south through private properties, with an existing flood channel located on Eden Valley Lane, which then flows south to Mt Whitney Drive, and through the proposed neighborhood 5 of this project. This directly connects into the feature that will be restored which travels through the Harmony Grove Village project. Please address any potential impacts of ALL the tributaries within the Eden Valley area.

All of Eden Valley has a Dark Sky policy, yet the NOP states that there will be LESS THAN SIGNIFICANT IMPACT in section D: Create a new source of substantial light or glare, which would adversely affect day or NIGHT TIME views in the area? Please revise this and address any potential direct and indirect impacts in the environmental document.

Properties directly to the west of the project are designated as very-low residential with large animal keeping. The proposed hillside lots on the western portion of the subdivision are much smaller in size, and do not provide an adequate transition in lot size from very-low density in the west, to higher density to the east. In addition, are the proposed lot sizes bordering existing homes consistent with other planned residential developments within the area?

Within the Landscape Specific Plan (17-11) it appears that the planting will be of a different "theme" than the already established neighborhood. Please clarify what the Valiano theme is and why it will be different from the existing area plantings.

Agriculture and Forestry Resources

According to a State farmland map, it appears the site is considered "unique farmland". How will the project mitigate for loss of these unique farmlands?

Air Quality

The NOP states that the project involves a GPA that would result in approximately 125 additional residences (an increase from 237 to 362 units). How did the 237 units number come into existence?

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

How will the substantial pollutant concentrations during construction affect the many horses and outdoor workers directly in the area?

Biological Resources

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

The proposed projects tentative maps appear to isolate areas of biological importance and do not provide any wildlife corridors. This will have a major impact on the animal life and potentially create an increase road kill rate as animals move between the biological areas. This could also potentially increase human/wildlife contact. There is an existing wildlife corridor from the west onto the proposed neighborhood 3. As an example, eliminated lots 234-240 and 136-146 would allow this area which serves as an existing and functioning wildlife corridor to remain accessible to the oak/riparian area.

The project site contains multiple unique topographies, ecosystems and natural characteristics of our County. We believe these are fragile, irreplaceable resources that are vital to the general welfare of all residents. As such, we request that special controls on development be established for all areas within this project that contain wetlands, floodplains, steep slopes, sensitive biological habitats, and prehistoric and historic sites. Present methods adopted by the County must guarantee the preservation of these sensitive lands on and around this development. To protect these sensitive lands and prevent their degradation and loss, we request a detailed Resource Protection Study for this entire site.

Throughout the project there are many area specified with RPO setbacks. These setbacks are established to protect the oak riparian wetland areas, yet within the RPO setbacks there appears to be multiple project lots, roads and grading areas. Please clearly identify the "Wetland Buffers" which are lands that provide a buffer area of an appropriate size to protect the environmental and functional habitat values of the wetland, or which are integrally important in supporting the full range of the wetland and adjacent upland biological community. Please determine the appropriate buffer widths, which should be 50 to 200 feet from the edge of the wetland as appropriate based on the above factors. Where oak woodland occurs adjacent to the wetland, the wetland buffer shall include the entirety of the oak habitat. The proposed development pattern should be evaluated for impacts to the RPO setbacks and fuel management easements.

Within neighborhood 3, the current RPO setback line does not appear to include all of the area that is under mitigation order for previous impacts by the former owner. Please clearly define the entire area that is included under mitigation order, along with associated RPO setbacks and fuel management easements.

Within the Oak Riparian Wetland area of neighborhood 3, there is mandate to the previous property owner in place, which indicates that onsite re-vegetation and enhancement is to be conducted. Please ensure the proposed re-vegetation and enhancement takes place, but it should NOT be used toward the mitigation requirements for this project, as it is a pre-existing condition of that parcel.

Throughout the development site we have noted:

>> "Mature Riparian Woodland": A grouping of oak trees having substantial biological value, where at least ten of the trees have a diameter of six inches or greater.

>>"Native Vegetation": Vegetation composed of plants which originated, developed, or were produced naturally in the San Diego region and were not introduced directly or indirectly by humans. Native vegetation may be found in but is not limited to marshes, native grasslands, coastal/inland sage scrub, woodlands, and forests.

>>"Riparian Habitat": An environment associated with the banks and other land adjacent to freshwater bodies, rivers, streams, creeks, estuaries, and other surface-emergent aquifers (such as springs, seeps, and oases). Riparian habitat is characterized by plant and animal communities which require high soil moisture conditions maintained by transported freshwater in excess of that otherwise available through local precipitation.

>>"Sensitive Habitat Lands": Land which supports unique vegetation communities, or the habitats of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the State California Environmental Quality Act (CEQA) Guidelines (14 Cal. Admin. Code Section 15000 et seq.), including the area which is necessary to support a viable population of any of the above species in perpetuity, or which is critical to the proper functioning of a balanced natural ecosystem or which serves as a functioning wildlife corridor.

Please address the potential impacts and mitigation regarding each of these bullet points in the environmental documents.

Geology and Soils

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

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



It appears that a large portion of the proposed homes will be elevated, changing the current topography and drainage of the greater area. What is proposed to buffer the existing homes located in or adjacent to any "Floodplain" or "Floodplain Frindge" area which are relatively flat areas of low lands adjoining and including the channel of a river, stream watercourse, or other body of water which is subject to inundation by the flood waters of the 100 year frequency flood as shown on floodplain maps approved by the Board of Supervisors.

Hydrology and Water Quality

According to Rincon del Diablo water district there is one of the largest natural aquifers located under our valley. How will the proposed grading, added street surfaces and other building items associated with this project affect the natural aquifer and it's ability to refill. This should be studied for potential impacts. Any blasting that will be performed during the grading phase should be studied to ensure it will not harm the existing aquifer under the valley, or the many wells in located in Eden Valley.

Land Use and Planning

This project will physically divide AND isolate the established community.

This project will conflict with all applicable land use plans, policies and regulation of any agency with jurisdiction over the project INCLUDING the General Plan, Specific Plan, and zoning ordinance

Access (20-2) the NOP refers to “unnamed private road easement (north of Surrey Lane – a private road.” The Huston Ranch Road is a private dirt road with MAJOR drainage and erosion issues as well liquefaction issues directly related to parcel 232-492-01. This road is not a publicly maintained, 40’ wide easement. It is maintained by two current residents with our tractor at Huston Ranch. We are unaware of an easement which been granted for the benefit and use of the subject property. Please clarify this.

Preliminary Grading Plans (23-4) the NOP refers to “private unnamed easement road” slated for road improvement with grading plans. The Huston Ranch Rd is a private road and any road improvements must be agreed to by the current residents of this road prior to improvements.

Noise

The established community is equestrian in nature. Horses are sound and movement sensitive with an innate “flight” response to such items. During construction, what kinds of safety precautions will be set into place for the many people who work directly with horses in the overall area. The valley is small with topography constraints that produce a rather loud echo throughout the area.

Population and Housing

What cumulative growth inducing effects an/or impacts will result from bringing the non-existing infrastructure into our Valley?

Public Services

The western portion of Hill Valley Drive appears to be too steep for the safety of vehicles and emergency trucks.

Transportation and Traffic

Please include the HGV projects full build out traffic numbers in the CEQA baseline, and not just existing traffic.

The Citracado extension was an essential part of the HGV projects traffic plan, hence with this proposed development. If this extension is substantially delayed or is never completed, what alternate infrastructure steps will be developed to alleviate this issue?

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

How will the additional traffic from this development impact health and safety issues for Palomar Hospital with added congestion from the intersection of Country Club Drive to the 78 freeway?

The traffic study show note that although the posted speed limit is 45mph on Country Club Drive at Hill Valley, it is also posted as a Traffic Calming area , as well as posted Equestrian useage.

Response to NOP
EIR 13-08-002
Page 7 of 7

Please notify the *Friends of Eden Valley for Responsible Development* when the environmental document is available for public review and future public hearings. If you have any questions, please contact me at 858-735-0550

Sincerely,
Janean Huston, Co-Chair
Friends Of Eden Valley for Responsible Development
1023 Country Club Drive
Escondido, CA 92029



San Diego County Archaeological Society, Inc.

Environmental Review Committee

25 June 2013

To: Ms. Beth Ehsan
Department of Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 110
San Diego, California 92123

Subject: Notice of Preparation of a Draft Environmental Impact Report
Valiano
PDS2013-SP-13-001, Log No. ER-13-08-002

Dear Ms. Ehsan:

Thank you for the Notice of Preparation for the subject project, received by this Society last week.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the County's environmental review process for this project.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File



20223 Elfin Forest Road
Elfin Forest, CA 92029

2013 Board Members:
Bonnie Baumgartner, Chair
Jacqueline Arsivaud-Benjamin, Vice-Chair
May Meintjes, Treasurer
Mark Shields, Secretary
Sandra Bartsch
Jan Denny
Nancy Goodrich
Amy Molenaar
JP Theberge
Melanie Fallon, At-Large Member

July 18, 2013

Mark Wardlaw, Director
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 93123

RE: Response to NOP for EIR for the Valiano Project – PDS2013-SP013-001, LOG No ER-13-08-002

Mr. Wardlaw,

The Elfin Forest Harmony Grove Town Council appreciates the opportunity to comment on the Notice of preparation of an Environmental Impact Report for the project referenced above.

Portions of the project are located within our boundaries (Neighborhood 5). In addition, the project directly contravenes both the letter of our community plan, and the spirit in which the larger community, including Eden Valley, negotiated in good faith with the then Department of Planning and Land Use over several years of planning for increased density in our valley. The key element of the compromise reached was a Village Development Pattern, enclosed within a Village Limit Line, which added 742 dwellings to our enlarged community of about 700 at the time. The VDP ensured the highest density was located in the center of the village, with increasingly larger lots towards the Village Limit Line, in order to blend as well as possible within the surrounding rural area of multi-acre lots, several being equestrian estates. This proposed GPA would add urban densities outside of the Village Limit Line, and transform buffer areas between the urban density and existing rural residences into high density residential. We are very concerned about the impact of this potential breach of trust of our agreed overall planning scheme for the valley.

From an overall planning perspective, this backfill clustered housing project could result in checkerboard development, which contravenes the adopted goals and maps of the General Plan.

Project Alternative:

We respectfully request that one of the alternatives analyzed be a project feasible without the need for a GPA, but instead under the recently approved General Plan and associated Community plan. As part of that analysis this alternative should determine the current maximum number of dwelling units possible under the current GP.

Project Description

The project description does not accurately describe its immediate surroundings.

- Description of Harmony Grove, which Neighborhood 5 is located in, is completely missing.

- The equestrian commercial operations in Harmony Grove and Eden Valley are not mentioned at all
- Reference is made for example to a mobile home park, which is actually in the City of San Marcos over a mile away from the project site, and separated from the site and the community of Eden Valley by several one- and two-acre lots.
- The community of Eden Valley to the East of the site is comprised of large estate lots from one to 20 acres, not “one acre”, nor “5,000 square foot lots to the North”. Those lots are in the city of San Marcos beyond avocado groves on steep hills without any connection to the proposed site.
- The Village Boundary Line is not “one-quarter mile south of Neighborhoods One and Two”. Neighborhood One (and Neighborhood 5) appear to be situated ON the boundary line.

Traffic Impact Analysis:

1. Baseline calculation: Since CEQA requires that the baseline be defined for comparing impacts, we request that baseline to include the full build-out of the adjacent Harmony Grove Village project, since it will likely be completed before Valiano would be built.
2. Impact of Citracado Parkway extension delay (or possible abandonment): The TIA states that the Citracado extension will be completed by 2015. The Union Tribune noted in its June 24, 2013 issue that the City of Escondido has announced start of construction will not start as planned this year (see <http://www.utsandiego.com/news/2013/jun/24/tp-cash-crunch-stymies-road-connect-work/>). The Director of Public Works is on record stating that instead of the 2015 planned opening, which was assumed in the Traffic Impact Analysis for HGV, it will now be "eight years" until that road is completed. The Valiano TIA needs to be redone to reflect the impact of non-completion within at least 8 years.
3. Restating of past baseline to calculate cumulative impact: Related to that last point, we request that the results of the traffic analysis of the HGV ADTs used to calculate cumulative traffic, if used, be based on a REVISION of the approved Harmony Grove Village EIR traffic study from 2007, to take into account this material change on the ground. At the time, it was contemplated a majority of traffic would exit the project towards the new Citracado extension, but now the assumptions need to be corrected to reflect the new reality that this extension may not be built for 8 years, if ever, according to the relevant agency, the City of Escondido.
4. Temporary impacts due to timing of improvements such as, but not limited to, the Citracado extension, should be fully analyzed and mitigated.
5. Changes to the status of existing roads: Country Club Drive (designed to handle only 4,500 ADTs) and Kuana Laua are non Mobility Element roads since the Public Facilities Element was eliminated as part of the General Plan. They are at risk of being added back to the Mobility Element Plan due to the added project traffic which would lead to deficient LOS by 2035. This is another example of a past compromise we ask the Department to honor: while accepting a doubling in housing density and a severe traffic impact from HGV, we also worked to downgrade not only these two roads to Minor Collectors, but also Harmony Grove Road and Elfin Forest Road. This took years of cooperation and collaboration with the developer, the Department of Public Works, DPLU, and the community. A GPA of the magnitude proposed, especially when combined with the change in planned improvements in Escondido, could jeopardize years of good faith collaboration, and result in these roads needing to be reclassified to accommodate the additional traffic impact.
6. Impact of road improvements on community character: The FPP from San Marcos Fire Department requires several local rural roads to be improved to DPW road standard, and their own minimum is 24' wide. This will affect community character for existing residents (Mt

Whitney Road, Eden Valley Lane, and Hill Valley Drive). Policy CM-2.3.1 of the approved Harmony Grove Community Plan states “restrict local public roads to two lane, undivided, curving streets”. In addition, the San Dieguito Community Plan Circulation Policy 2 states “road alignment shall minimize the necessity of altering the landscape by following the contours of the existing, natural topography thus enhancing scenic vistas”. Circulation Policy 6 also states “Classification of Mobility element Roads should reflect the low intensity land uses adopted in the San Dieguito Community plan”.

Health and Safety Impacts:

1. Evacuations: Existing and future residents alike could be facing a dangerous situation in an emergency such as a mass evacuation due to a wildfire or an earthquake. The Law Enforcement comments in the Scoping Letter stated: “The limited roadway access points may be cause for future concern in the event that mass evacuations are required for say, a wildfire”. Improving the current roads may not be sufficient to allow the existing residents with their horse trailers to evacuate on time once the HGV project is fully built-out, especially with Citracado extension off the map, and a doubling of the Sprinter line schedule, which creates a bottleneck for evacuation to the North. The EIR should evaluate worst case conditions at full build-out without Citracado to evaluate whether current and future residents of HGV and Valiano could safely evacuate on Country Club and/or Harmony Grove Road. The most useful analysis would determine a maximum number of dwellings in the valley to allow for safe egress in case of emergency evacuation. Prevailing winds and past fire emergencies patterns should be modeled, to determine the wisdom of adding potentially over 1,000 people in a bottlenecked valley already at the wildland - urban interface.
2. Building in a flood plain: Several proposed neighborhoods, including Neighborhood 5, are proposed to be raised out of the flood plain to build homes above it; what will be the impact on neighboring residences in the event of a flood? The area already floods regularly without modifying the drainage patterns. Where will the displaced water drain to? What will be the aesthetic and visual impact from the local public roads and residences?
3. High number of cul de sacs with limited overall egress points. The proposed design could be problematic in case of emergency evacuation.
4. Neighborhood 5 isolated from emergency routes of remainder of project. Should Country Club Drive be affected by the emergency (such as a wildfire or other catastrophic event from that direction), how will residents be able to evacuate safely?

Dark Skies Policy Impacts:

The San Dieguito Community Plan Dark Skies Policy 1 states that “In general, outdoor lighting (...) must not be visible from any adjoining property or street”. How will a development of 362 homes in the middle of a rural valley, with some homes stepped up the hillside, others raised above existing residences, be able to meet that requirement?

Cultural Resources Impacts:

The Fines Historic Complex needs to be tested to make a determination of significance.

Geology and Soils:

We believe the statement on page 18 of the Environmental Checklist Form may be inaccurate: “The project (...) will not alter existing drainage patterns; is not located in a floodplain, wetland or significant drainage feature”. The EIR should analyze whether raising Neighborhood 5 and other areas above current

residences to situate it above the flood plain will result in drainage or other related issues for surrounding properties.

Biological Resources:

The San Marcos FD FPP calls for 150' fuel modification zone "from all sides of all structures". How will this be accomplished with the planned layout without affecting the biological resources onsite? Will there be any biological open space left onsite with this requirement at the proposed density?

Community Character and Community Plan conformance:

The proposed project detracts from the existing community character with small lot sizes, higher residential density, destruction of wildlife corridors, and lack of space for equestrian uses within the lots. As designed it also destroys the existing and essential buffering function of the project site itself. The EIR should analyze the following impacts:

1. Buffers: The Harmony Grove Community plan Policy LU 2.1.4 requires "an open space buffer between urban areas and rural community to preserve character of unincorporated community". The Neighborhood 5 property was supposed to provide that buffer between HGV and the rural community. The highest density is now planned in that former buffer zone. Please analyze impacts on community character.
2. Greenbelt: General Plan Policy LU 2.5 promotes the use of greenbelts to define communities "to reinforce the identity of individual communities". Staff notes "the project site appears as a green belt between San Marcos and Eden Valley". The proposed onsite open space will not function as a green belt because a) it is within a gated community and b) it adds 362 homes into a green belt, which by definition is free of high density.
3. Lot size: The current project design does not meet the Harmony Grove Community plan Policy LU-1.5.1: "Require minimum lot size of 2 acres outside the Village Boundary (...)". As stated above in "alternative project", the EIR should evaluate the impact of developing within current General Plan guidelines.
4. Animal keeping: The current project design also violates HGCP Policy LU-1.5.3 "Provide for lot sizes that will permit residents to keep market and leisure animals on their property".

Thank you for the opportunity to comment.

Sincerely,



Jacqueline Arsivaud, Vice-Chair

CC: Beth Ehsan, Maggie Loy

Mark Wardlaw, Director
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, California 92123



P.O. Box 460791
Escondido, CA 92046-0791
www.escondidocreek.org
information@escondidocreek.org
760.471.9354

July 18th, 2013

Re: PDS13-SP-13-001. LOG NO. ER-13-08-002; VALIANO

**BOARD OF
DIRECTORS**

Kevin Barnard,
President
Police Officer, ret.
Jeff Swenerton,
Vice-President
Retired Educator
Ron Forster, Secretary
Community Volunteer
Jon Dummer,
Treasurer
Company President
Tim Costanzo
Small Business Owner
Jerry Harmon
Escondido Mayor, ret.
Laura Mitchell, PhD
Psychologist
Leonard Wittwer
Research Scientist, ret.
Steve Barker
Community Volunteer
Betsy Keithley, PhD
Scientist
Brent Alspach
Environmental Engineer
Richard Murphy
Operations Manager
Greg McBain
Retired Engineer

Of counsel
Everett Delano of
Delano Law Offices

Dear Mr. Wardlaw,

Thank you for the opportunity to comment of the Notice of Preparation for the EIR of the Valiano project. Please find the following comments below regarding the proposed project. The Escondido Creek Conservancy (TECC) is a non-profit, public benefit, corporation, incorporated in 1991, dedicated to the preservation, restoration and protection of the natural open space within the Escondido Creek watershed. TECC believes the natural lands within the watershed are an irreplaceable natural asset with great community value. We support educational programs and compatible outdoor recreation within the watershed for the benefit of all residents of the area.

Biological Resources

The current design of the Valiano project isolates open space areas by the homes, roads and associated infrastructure that are part of the plan. It appears that the quality of the open space is compromised by this design and should not be considered 'of like kind' with regards to use as mitigation (high quality habitat that is circumvented by development should not be used as mitigation). In addition, the defensible space within these open space areas should not be included as mitigation, as this area is subject to being mowed, brushed, cleared etc.

Wildlife corridors are obstructed by the current design of the Valiano Project. The wetland areas and Riparian corridors are either obstructed or isolated from each other. Neighborhoods 2, 1 and 5 are within proximity of the Harmony Grove Village project and should provide connectivity to any existing wildlife corridors and open space areas including riparian areas/tributaries to Escondido Creek.

The current design of the plan increases the risk of isolating wildlife, and also increases the risk of wildlife subject to road kill without the appropriate conservation, preservation of riparian corridors, and implementation of wildlife corridors. How will wildlife corridors be incorporated if the natural areas are not preserved? How will the wildlife be protected from traffic?

The Escondido Creek Conservancy (TECC) is a non-profit, public benefit, corporation dedicated to the preservation and protection of the natural open space within the Escondido Creek watershed. We support educational programs and compatible outdoor recreation within the watershed for the benefit of all residents of the area.

There are areas of non-native grasses and old agricultural pastures onsite that provide significant foraging grounds for many species in the area, and also provide a wildlife corridor in the project area. These species also provide vector control of rodents and insects to the area. Such species include, but are not limited to: coyote, bobcat, Mountain lion, California long-tailed weasel, opossum, raccoon, Red-tailed hawk, Barn owl, California horned lark, Coopers hawk, Northern Harrier, Merlin, Prairie Falcon, American Kestrel, Turkey Vulture, Red Diamond Rattlesnake, Southern Pacific Rattler, and Rosy Boa.

Local residents, naturalists, wildlife enthusiasts and scientists have observed the following wildlife species within the impact areas and immediate surrounding areas: Bobcat, Mountain Lion, American Badger, Southern Mule Deer, Coyote, Bald Eagle, Golden Eagle, Red-tailed hawk, Red-shouldered hawk, Sharp-shinned hawk, Osprey, American Kestrel, Northern Harrier, Cooper's hawk, white tailed kite, Merlin, Prairie Falcon, American Peregrine Falcon, White-faced Ibis, Turkey Vulture, Barn Owl, Western Screech Owl, Great horned Owl, California Gnatcatcher, Southern-California rufous-crowned sparrow, Western bluebird, yellow warbler, Canada Goose, San Diego Horned Lizard, Orange-throated whiptail, Western spadefoot toad, Southern pacific rattlesnake, red diamond rattlesnake, rosy boa, king snake and western pond turtle. Also Anna's hummingbird, costa's hummingbird, bushtit, pine siskin, Wilson's warbler, lesser goldfinch, wrenit, cliff swallow, American robin, northern mockingbird, California quail, mourning dove, western scrub-jay, purple finch, house sparrow, white-crowned sparrow, yellow-rumped warbler, house finch, dark-eyed junco, western wood-peewee, fox sparrow, ash-throated flycatcher, western kingbird, Nuttall's woodpecker, acorn woodpecker, hooded oriole, western meadowlark, California towhee, spotted towhee, European starling, American crow, common raven, greater roadrunner, black phoebe, red-winged blackbird, black-necked stilt, snowy egret, mallard, killdeer, cormorant, great egret, great blue heron, belted kingfisher, and American white pelican. California ground squirrel, pocket gopher, American bullfrog, pacific tree frog, western toad, southern alligator lizard, western fence lizard, western whiptail, gopher snake, and garden slender salamander.

Has anyone observed the brown headed cowbird in this area? This species parasitizes the nests of Least Bell's Vireo. IF LBV is observed in the impact areas/project footprint, the cowbird should be addressed in the study and how impacts will be avoided/managed long term.

With regards to the wetland areas, drainages and riparian areas. Should there be impacts to these habitats; mitigation should include the restoration of these areas and control of non-native plant and animal species such as the American Bullfrog and other vectors of Chytrid fungus that will have an impact on the native amphibian species in this tributary to the Escondido Creek Watershed.

There are a number of bat species in the area; there should be biological surveys to include this species. Foraging bat and roosting bat surveys should be done.

The Escondido Creek watershed is part of the Pacific Flyway for migratory birds, impacts to these wetlands in the project footprint will affect this important resource for migratory birds, protected under the migratory bird treaty act. Many migratory birds have been seen in this area, and surveys should be done accordingly. There are a number of aquatic species in the wetlands, and the

biological survey should include these areas for nocturnal and diurnal species. Will mammal trapping be part of the biological surveys?

In addition, the Harmony Grove Village Project should be included with regards to overall cumulative impacts to the area in conjunction with certain studies (because the project is in construction at this time-modeling will need to be used to project anticipated impacts for certain studies), including but not limited to: Traffic Studies, Climate Analysis, Air Quality, Noise Analysis, Impacts to Night Skies, Evacuation Plan, Fire Protection Plan, Noise Analysis, Land Use/Community Character Study, Agricultural Technical Report.

Other Document Requests:

Please include in the Draft EIR the following studies:

Biological Resources Report with Conceptual Resource Management Plans (On- and Off-Site) Emergency Response Plan and Risk Management Plan, Evacuation Plan, Fire Protection Plan, General Plan Amendment Report, Geotechnical Report, Groundwater Investigation, Hazardous Materials Information, Land Use/Community Character Study, Letters of Permission (Easement Holders), Off Site Biological Mitigation Information, Open Space Fencing and Signage Plan (Biological Open Space), Phasing Plan, Photometric study, Trails Plan, Vector Management Plan, Visual Resources Plan to include impacts to Night Skies, Water Service Report, Water Supply Assessment.

Thank you for your time and consideration of these comments.

Respectfully,

A handwritten signature in black ink that reads "Angelique Hartman". The script is cursive and fluid, with the first letter of each name being capitalized and prominent.

Angelique Hartman
Environmental Consultant and Land Use Committee Member
The Escondido Creek Conservancy

July 21, 2013

Ms. Beth Ehsan
County of San Diego,
5510 Overland Drive
San Diego, California 92123

Via email: beth.ehsan@sdcounty.ca.gov

Dear Ms. Ehsan:

SUBJECT: Scoping Comments for PDS2013-SP-13-001, LOG No. ER-13-08-002; Valiano

San Diego Audubon Society appreciates this opportunity to comment on what to include in the Environmental Impact Report for this project. The proposed project intends to build a large suburban development in an rural and agricultural area. As such it will require an amendment to the new General Plan and will potentially have very significant environmental impacts of many types. We urge that the EIR fully identify these impacts and mitigation measures that will fully offset them, and make it clear which impacts cannot or will not be fully mitigated.

AGRICULTURE: The project will bring suburban residents into an agriculture area. They are likely to object to insects, odors, sounds, chemicals, etc. that can accompany agriculture. This can lead to political pressure to eliminate, or at least degrade nearby agricultural productivity. We urge that the EIR fully evaluate this potential impact on agriculture.

AIR QUALITY: The project will develop 362 units. The General Plan would allow 237 units. The Notice of Preparation suggests that the EIR will address only the air quality impacts of the difference, 125 units. While this may be legal it is definitely misleading and dishonest. The fact that the General Plan would allow 237 units does not mean they would have ever been built. We strongly urge that the EIR compute and describe the mitigation that would be required the air quality impacts of the construction of the project, the transportation for people living in and providing services to the project, and from the heating, water heating, water pumping, and cooling that will be required for the life of the project. Analyzing just the increment between the General Plan and the proposed Amendment is likely to result in an inappropriate decision.

BIOLOGICAL RESOURCES: The Public Notice mentions that the project may have significant impacts on sensitive species, sensitive habitat communities, wetlands and wetland buffers, drainage, wildlife movement and dispersal corridors, and local habitat conservation plans. We urge that the EIR fully identify those resources, the potential impacts, all feasible mitigation for them, and the extent to which the impacts will not be offset by the mitigation. For a suburban/rural development like this maintaining wildlife movement corridors is especially important. We urge that the EIR provide sufficient measures and space for this purpose.

The project will include equestrian facilities, which will increase the use of horses on trails outside of the project area. This use will result in horse droppings outside of the footprint of the project. The droppings will tend to attract cowbirds, whose parasitism will threaten the reproductive success for least Bell's vireos and other sensitive species. We urge that the EIR quantify this impact and require mitigation that will offset this impact inside and outside the footprint of the project.

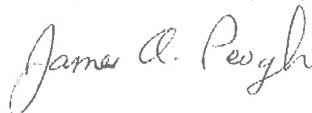
GREENHOUSE GAS EMISSIONS: This project will produce a suburb development of 362 units in a rural location far from urban services, materials, and facilities. As such it will result in the emission of an extremely large quantity of greenhouse gas. The Notice of Preparation mentions the County's Draft Guidelines for Determining the Significance for CEQA documents. Those guidelines have not been adopted and must not be used for this project. We strongly urge that the EIR actually compute the expected level of the greenhouse gasses that will be emitted in the course of the construction of the project, the transportation for people living in and providing services to the project, and from the heating, water heating, water pumping, and cooling for the life of the project. The project will also provide for horses. The GHGs that will result from those horses should be included. There is no justification for the County to allow some vague comparison to a not very similar hypothetical project to determine the impacts of this project. The project should be required to mitigate for the difference between the volume of GHGs from this project and an efficient urban infill project for the same number of units.

HYDROLOGY AND WATER QUALITY: In section VIII b) the Notice of Preparation points out that the project is within a Hydrologic Unit that is already impaired for Coliform bacteria, nutrients, and sediments. It indicates that the impact of the project will be "Less than significant with mitigation incorporated" with no explanation. We urge that the EIR quantify the sources of these pollutants that will result from the project, including the equestrian activities and quantify the removal capability of each BMP that will be provided for construction and post construction to verify that the projects will not further degrade the downstream impaired waterways. The EIR should also indicate at what storm conditions the BMPs will no longer be able to treat the pollution. We also urge that the EIR specify the level of maintenance that will be required to keep the BMPs functioning at the necessary level. It is not adequate for the EIR to simply provide a laundry list of BMPs that might be used and assert that they will prevent the impacts.

In section VIII f) the Notice of Preparation indicates that "The project could have an adverse effect on drainage patterns or the rate or amount of runoff because it could significantly impair, impede, or accelerate flow in a watercourse of increase erosion or siltation." Oddly, it indicates this impact will be "Less than significant with mitigation incorporated". To accomplish this, building pads will be located outside the lines of inundation for the 100-year flood plain. However these increases in rates and amounts of runoff will also have an erosion, siltation, flooding, or mudslides impacts on development, infrastructure, and waterways outside of the development. We strongly urge that impacts to offsite development, infrastructure, waterways, and downstream water quality be evaluated and either avoided or mitigation in the EIR.

WATER: Large-lot, suburban/semi-rural developments tend to use large quantities of water for a variety of reasons. In section XVII e) the document discusses difficulties for getting water service to and reservoirs for the project. However it does not point out that this sort of development is a very inefficient use of water. We urge that the EIR compute the expected water use for this development and the energy needed to get the water to the users. We also urge that the project be required to provide mitigation to reduce those levels and to offset their water consumption impacts on the region. We also urge that the EIR include the impacts of the additional piping to bring water to the project and the construction of the needed reservoirs.

Please keep us informed of future documents, hearings, and other milestones for this project. For questions or follow up I can be reached at 619-224-4591 or peugh@sandiegoaudubon.org.



James A. Peugh
Conservation Committee Chair
San Diego Audubon Society