

**Ehsan, Beth**

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

Dear Ms. Ehsan,

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

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

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

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

As far as development goes, all developments should follow the community plan for the area. This development is not in harmony with the community plan, that was approved by the county. Lots should be large, as are most of the surrounding lots. Clustered developments, such as this one and Harmony Grove Village, bring an urban flavor, to what is supposed to be rural, to the area, which destroys the community character of the area.

Harmony Grove Village should not have been approved, but this development should not be approved simply because Harmony Grove Village was approved (again, one project typically begets the next). Two wrongs don't make a right.

There are many horses in the area, and with the commercial area proposed in this new project, along with the additional homes added to the already approximately 800 approved homes, will make it difficult for people to ride their horses safely.

AG-1 Comments noted. Due to the distance of Elfin Forest from the Proposed Project, as well as intervening higher topography that obscures the Project, direct impacts to the community character of Elfin Forest would not occur.

Elfin Forest could have impacts from the Project relative to "dark skies." As stated in EIR Subsection 2.1.2.5, existing visible night lighting during environmental review was associated with private homes and equestrian activities. Future streetlights are not proposed along the Proposed Project roadways in general; but would include safety and directional lighting at intersections, consistent with the San Diego County Light Pollution Code (LPC). Intersection street lights would be 18 to 20-foot tall with a shielded down light. Lighting design would include the use of full cut off light fixtures and glare louvers, ensuring that light rays are projected downward and that glare and spillage into the sky or onto adjacent property are restricted to levels permitted by the LPC. Lighting would conform to regulations and impacts would be less than significant.

Due to the fact that Elfin Forest is located more than five miles southwest of the Project site, the Project would not affect the use of existing septic systems.

AG-2 The comment is correct that the San Elijo Hills project is located within the jurisdiction of the City of San Marcos. Regarding traffic heading west on Elfin Forest Road, see Response K-165.

AG-3a The Project housing density is characterized by the County as semi-rural, substantial areas of open space would be incorporated into the Project, and large animal keeping lots are included in two of the neighborhoods. These are not common features of urban settings. See also Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis and Response U-2a for information on elements of the Project that make it semi-rural.

Projects are evaluated relative to their existing setting, impacts, and benefits at the time they are brought forward for consideration. Approval is not based solely on whether a prior project was approved. The design, impacts and mitigation of that prior project, however, may affect the later assessment; potentially resulting in some impacts being assessed as greater, and some as lesser, based on resources present and how they would be affected by the project under review.

COMMENTS

RESPONSES

AG-3b There is no commercial area proposed in the Project. The Project would be safe for people to ride their horses as it has been designed to be equestrian-friendly. The Project would contain various equestrian-friendly amenities, such as: retaining portions of the existing equestrian facility in the southeast corner of the Project as an equestrian staging area (the site would be reconfigured to allow public horse trailer parking and use of an exercise ring); promoting equestrian use through the provision of an equestrian trail head area and multi-use trail network; and having Neighborhoods 3 and 5 that would provide lots that would accommodate horses within the County's animal keeping guidelines.

COMMENTS

RESPONSES

AG-4 This project will cumulatively add more traffic onto the road and impact people to the east and west of the project and will impact those of us to the west in Elfin Forest. We are currently on a two lane, light collector road. There are no sidewalks, no bike lanes, and the roads may not even be to code for width. We have seen multiple accidents (some fatal) occur along Elfin Forest and Harmony Grove roads due to people using the roads as a short cut, passing on blind curves (our road have double yellow lines where no passing is allowed). Many bike riders use Elfin Forest and Harmony Grove Roads to travel on. There are no bike lanes, and with the new law, drivers must stay a certain distance from them, which causes the car drivers to cross over the double yellow lines to get by them, around these blind curves. Many parts of the roadway along Elfin Forest and Harmony Grove Road have streets and driveways exit onto them. Many of these areas have poor site distance, especially given that most of Harmony Grove Road is 45 mph, and 50 mph along Elfin Forest Road. The added traffic will cause more problems. The lack of a comment about any traffic from this development westward along Harmony Grove Rd and Elfin Forest Rd from this development, or to say that the traffic would be at a level of insignificance is inaccurate. Once again, all that needs to be done is to study the effects of San Elijo development on our roadways to see that there will be an impact. The cumulative impact of San Elijo, or other developments to the west, and including Harmony Grove Village, Valiano, and another proposed project (to the south of Harmony Grove Rd bordering the Elfin Forest Reserve....potentially 300 homes) should ALL be taken into consideration when doing a traffic study for potential impacts to the current RURAL communities in the area.

AG-5 Besides the known impacts, destruction of community character should also be an important consideration when looking at an EIR.

AG-6 I have lived, as I said, out in the Elfin Forest area for over 32 years. I have evacuated 5 times due to fires in our area. I noticed last year that the evacuation was very dangerous due to the urban development in San Elijo. The Sheriffs dept (I think) blocked off Elfin Forest Rd and we were not initially allowed to evacuate in that direction, effectively putting us in a dangerous situation, not allowing us to leave, as fire was coming our way. Even if the roads had been open, it would not have helped because the evacuation route was gridlocked, LOS F, due to the volumes of cars fleeing the San Elijo development. Had the fire moved faster, or had we had a fast wind, there could have been many lives lost. With the development of the Harmony Grove Village and now possibly the Valiano project, the EIR does not adequately address the large amount of homes, and the traffic that comes with it, and how people will be evacuated. It was not adequately addressed in the EIR with Harmony Gove Village either. We, in Elfin Forest, have two ways in and out: we can go to the east along Harmony Grove Rd, or to the west along Elfin Forest Rd to San Elijo. With these developments off Harmony Grove (including the future development by the EF Reserve), it will increase the danger to the homeowners because of the inability to flee the area in a disaster.

AG-7 In addition, due to the fact that there are so many horse owners in Elfin Forest and Harmony Grove, there could be a substantial loss of animal life, given that many of the horse trailers may not be able to get out. I believe that the county would be liable for any loss of life, should this, or any other, developments be approved, given the known problems with traffic and poor evacuation routes due to increased traffic due to these developments.

AG-8 I do not have a problem with a property owner developing their property as the surrounding properties, but I do have a problem with density increases. A property owner knows what they can build on a parcel when they buy it. They do not have a right to develop it at a higher density. Our area, as said before, is supposed to be rural, on septic systems (to keep density low). We moved out here for the dark skies (therefore no light pollution with street lighting), the quiet, the horse trails, and the dirt paths. The county has the responsibility to allow development in our area that is the same as the current, rural development, as per our community plan. The county has the responsibility to keep our community safe on our roads, and safe in an evacuation. I see nothing in this development that adds anything positive to our rural community. I ask that the county scale back this development and make sure it stays in harmony with our current community: large lots (2 acres), septic tanks (no sewer), no street lighting, etc.

AG-9 Thank you.

AG-10

AG-4 Per County of San Diego Report Format & Content Requirements for Transportation and Traffic, locations receiving 25 directional peak hour trips are to be included in the traffic analysis. Since the Project adds fewer than 25 trips to Harmony Grove Road/Elfin Forest Road west of Country Club Drive, any analysis further to the west is not warranted. As discussed in Subsection 2.8.2.8, the Project would not create significant traffic hazards to bicyclists on nearby roadways. The additional traffic described above would not impact traffic in a way that would preclude or hinder a vehicle's ability to leave a 3 foot margin while passing a cyclist. As the Project does not cause a significant impact regarding bicycle safety on Harmony Grove Road, no mitigation has been proposed regarding this issue.

AG-5 See Response K-165 regarding analysis of traffic on Elfin Forest Road. In addition, per County of San Diego Report Format & Content Requirements for Transportation and Traffic, locations receiving 25 directional peak hour trips are to be included in the traffic analysis. Since the Project adds fewer than 25 trips to Harmony Grove Road/Elfin Forest Road west of Country Club Drive, any analysis further to the west is not warranted.

AG-6 Community character is an important criterion in environmental review. It is addressed in detail in the Project Visual Impact Assessment (VIA) as well as EIR Subchapter 2.1 and Section 3.1.4. See also Responses AD-5 and U-2a.

AG-7 The comment raises fire safety issues with evacuation. This comment is addressed in Topical Response: Fire/Evacuations.

AG-8 See Topical Response: Fire/Evacuations regarding evacuations.

AG-9 The comment is correct that the Proposed Project would increase density compared to the existing General Plan designation. A General Plan may be modified if appropriate engineering, design and environmental review are completed and the Board of Supervisors approves a General Plan Amendment (GPA). During deliberations on the Project, the Board of Supervisors will consider whether or not to approve a GPA. The Project as proposed would not move forward if the GPA is not approved. The opinion of the commenter is included as part of the record and available to the decision makers prior to the final decision on the Project.

AG-10 The points raised in this comment do not raise environmental issues with respect to the EIR; the opinion of the commenter related to the County's responsibilities is included as part of the record and available to the decision makers prior to the final decision on the Project. See Topical Response: Septic and Responses G-3, G-6 and G-7 regarding the issue of septic versus sewer. See Responses U-2a and AG-1 regarding rural character and dark skies and Topical Response: Fire/Evacuations

COMMENTS

RESPONSES

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cont.

regarding fire evacuation. The Project would also implement public multi-purpose trails appropriate for use by horses. These trails generally would provide 10 feet of soft surface and would wind through the Project, connecting to Country Club Drive and planned trail by Harmony Grove Village at its southern extent (see EIR Figure 1-18).