

COMMENTS

RESPONSES

Ehsan, Beth

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

Dear Ms. Ehsan:

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

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

The following are my major concerns with the project:

Community and Land Use Example

- General Plan Update: In the 2000s, the County staff and many members of our community (upwards of 60+ over many many meetings) collaborated on the General Plan Update and it was decided that our community should take "our share of density" to accommodate the growth that SD County would experience over the next 20 years.
Harmony Grove Village: Then came New Urban West proposing a massive development. We worked with them over several years to come up with a project that fits in with the Community Development Model and our community plan previously elaborated with County Staff.
NC17: This property had already received an up zone from SR2 to SR1. Then they came back in front of the BOS to ask for yet another up zone to SR0.5. This time, the BOS denied them for the reasons mentioned above: it violates the CDM, this community has already accepted its fair share and it violates the spirit of the agreement

AJ-1 Introductory comment noted. This comment indicates that the Project would threaten to destroy the community (character); please note that the EIR analysis does not come to the same conclusion. Your hope for the developer to follow the vision of the General Plan is hereby included as part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

See Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis and Response AD-3 regarding the Community Plan. Please see responses to specific comments, below.

AJ-2 Thank you for your participation in the General Plan Update process. See Response AD-2 regarding need for a GPA. See comments I-3 and I-4 regarding consistency with the Community Development Model.

AJ-3 This is a repeat of comment AD-3. See Response AD-3.

AJ-4 This is a repeat of comment AD-4. See Response AD-4.

COMMENTS

RESPONSES

AJ-4 cont. we made with county during the general plan process. Now, they are trying a third time to get an up zone. Nothing has changed on the ground since it was rejected the last time. The same logic applies and BOS should not approve this up zone for the same reasons as before.

AJ-5 • **Community Plan:** Our community plan calls for a rural community with rural zoning and rural environment. The applicant claims it is a semi-rural development and claim to have rural themes. If houses tightly clustered together, with 1000 foot walls, 20 feet high, manufactured slopes, street lights, fencing and gates and cul-de-sacs can be defined as rural, I think they are looking at the wrong dictionary. Please, look "rural" up in the dictionary. Valiano is none of these things. Not only is this a significant impact but it is an existential impact: our community would be destroyed if Orange County-style developments like Valiano are squeezed into our little bucolic valley.

AJ-6 • **Septic:** Our community plan calls for septic, not sewage treatment plants (again, not rural). This is inconsistent.

Fire Safety Examples:

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

AJ-7 • From the DEIR it is clear that they have not taken into account the most recent fire, Cocos Fire. The DEIR states most fires come from the East, when the last few fires, including Coco's came from the West. I could see the Cocos fire from my house in western Elfin Forest, and of course had to evacuate with my family, animals, and a few belongings.

AJ-8 • The 326 houses proposed will make evacuation a very difficult proposition. The DEIR does not show how evacuation will proceed during a wildfire event. The only egress, Country Club Road, will be at LOS F (according to the DEIR) and evacuation on this two lane road will be hazardous and create a fire trap. On the other end of the valley, San Elijo Road (which is a 4 lane road emptying into a 6 lane road) had people sitting in their cars for over an hour as flames were visible overhead on Double Peak. Had the fire not changed direction towards Harmony Grove as they did, you would have had a tragedy on your hands. Country Club is only a 2 lane road with LOS F. It is facing evacuation traffic from 742 houses at HGV, 325 houses at Valiano in addition to the trailers for upwards of 180 horses in Eden Valley.

AJ-9 • The Fire Protection Plan (FPP) makes no mention of evacuating horse trailers and how that would impact evacuation. Please address this. We have twice as many horses in Eden Valley than we have houses. Trailers are slow, hard to maneuver, big and, importantly very hard to load animals on to. There is only one way out of that valley: Country Club Road towards Autopark way. In the Harmony Grove Fire, many people were unable to get their horses into a trailer, so walked them out – down the middle of the street. If the fire comes west, like it did during Cocos there will be a massive traffic jam (LOS F means bumper to bumper traffic in non-evacuation circumstances) that could doom residents to a death trap. Can you imagine this chaotic scene? People walking, cars in the road, horses in the road, everyone in a state of panic – and multiple this by the number of homes and animals. This is significant and not mitigated.

AJ-10 • The response times from San Marcos Fire District would be 7.5 minutes (above the 5 minutes standard). The DEIR assumes mutual aid from a fire station that hasn't been funded (at HGV) so that fire station cannot be used in the analysis. They are offering to pay into that fire station, but not Escondido Fire which will likely be the first responder. This is significant.

AJ-11 • Additionally, they are increasing our risks by asking for (and have already received) a variance on road width on Hill Valley because they don't have easements to widen it. It is not wide enough for two fire trucks to pass side by side. SMFD gives them the variance, but other FD will likely respond (and deal with the safety consequences). **This puts us at more risk as firetrucks will have reduction of access to Hill Valley Road.**

AJ-5 This comment is substantially similar to comment AD-5. See Responses G-7 and AD-5.

AJ-6 This is a repeat of comment AD-6. See Responses G-3 and G-7.

AJ-7 This is a repeat of comment AD-7. See Topical Response: Fire/Evacuations and Response K-59.

AJ-8 This comment is substantially similar to comment AD-8. See Topical Response: Fire/Evacuations regarding fire safety with evacuation.

AJ-9 This comment is substantially similar to comment AD-9. See Topical Response: Fire/Evacuations regarding evacuations.

AJ-10 This is a repeat of comment AD-10. See Responses K-199 and AD-10.

AJ-11 This is a repeat of comment AD-11. See Response AD-11.

COMMENTS

RESPONSES

AJ-12	<ul style="list-style-type: none"> They are assuming existing home owners will be responsible for Fuel Modification Zones, an encumbrance to those landowners.
AJ-13	<ul style="list-style-type: none"> Lastly, the FPP focuses exclusively on the impacts to <i>the project</i> but no reference to how it will jeopardize the wellbeing and safety of existing community. <p>Traffic Examples:</p>
AJ-14	<ul style="list-style-type: none"> No analysis was made of the traffic heading West towards Elfin Forest Road. We know, from observation, that the traffic flow is more than 6% as stated in the DEIR. There is also a bottle neck at San Elijo Road.
AJ-15	<ul style="list-style-type: none"> The intersection of Country Club and Autopark Way (the main ingress and egress of the project) is already majorly congested. Even now, without HGV built out, we sometimes have to wait two light cycles just to turn left onto Auto Park Way. What's going to happen when all the houses from HGV and Valiano go in? This is an unacceptable, unmitigated impact.
AJ-16	<ul style="list-style-type: none"> Furthermore, when the Sprinter comes by every 30 minutes (and soon, it will come every 15 minutes, according to NCT) it becomes even more congested. This impact is significant and unmitigated properly in the plan.
AJ-17	<ul style="list-style-type: none"> Citracado Parkway has not been funded yet and there is no indication as to when it might come online. The traffic study doesn't reflect that correctly.
AJ-18	<ul style="list-style-type: none"> The sight lines at the intersection of Mt. Whitney and Country Club as well as those at Hill Valley and County Club do not meet county standards. <p>Equestrian Examples:</p>
AJ-19	<p>The applicant's attempt at incorporating a small number of equestrian lots to somehow check the box on rural and equestrian fails on a number of levels.</p> <ul style="list-style-type: none"> First, there aren't enough equestrian lots. We are an equestrian community and outnumbering equestrian houses with non-equestrian houses will tip the balance against horse-keeping and more towards suburban living.
AJ-20	<ul style="list-style-type: none"> Shoe-horning horses and stalls onto 1/3 acre lots along with a two story house and garage makes it less likely that the property will be used for horse-keeping. There is barely enough space for a horse to be kept humanely.
AJ-21	<ul style="list-style-type: none"> A horse eats at least 600 pounds of hay a month and produces 500 pounds of manure and soiled bedding every week. On a 1/3 acre lot, there is really no place to pile manure or store hay in a safe manner. Hay, if not kept correctly, can spontaneously combust. It is the cause for many a barn fire. <p>General Plan Incompatibility:</p>
AJ-22	<p>If the project is allowed to proceed as proposed it will be in direct conflict with at least two of the initiatives contained within the County's Strategic Plan. Specifically:</p> <ul style="list-style-type: none"> <i>Make neighborhoods healthy places to live, work and play</i> <ul style="list-style-type: none"> The noise, air pollution and traffic associated with this project would make my neighborhood a markedly unhealthier place to live, work and play compared to today <i>Help communities prepare, respond and recover from public health threats, environmental hazards and other emergencies</i> <ul style="list-style-type: none"> If this project was built as proposed, the inability to evacuate safely and in a timely manner during a wildfire would leave my community far less able to respond to such an emergency
AJ-23	

AJ-12	This is a repeat of comment AD-12. See Response AD-12.
AJ-13	This is a repeat of comment AD-13. See Response I-59 for how the proposed fire protection measures would affect the whole neighborhood.
AJ-14	This is a repeat of comment AD-14. See Responses K-165 and AD-14.
AJ-15	See Responses E-12 regarding proposed improvements to Country Club Drive and the intersection with Auto Park Way and K-167 regarding the analysis and mitigation of that intersection.
AJ-16	See Response I-61 regarding impacts of the SPRINTER.
AJ-17	This is a repeat of comment AD-17. See Response AD-17.
AJ-18	This is a repeat of comment AD-18. See Response AD-18.
AJ-19	This is a repeat of comment AD-19. See Response AD-19.
AJ-20	This is a repeat of comment AD-20. See Response AD-20.
AJ-21	This is a repeat of comment AD-21. See Response AD-21.
AJ-22	This is a repeat of comment AF-20. See Response AF-20.
AJ-23	This is a repeat of comment AF-21. See Response AF-21.

COMMENTS

RESPONSES

Visual Character Examples:

AJ-24 The project will be introducing elements that drastically change the aesthetics and visual character of the community in a permanent and significant way:

- AJ-25 • Extensive grading, manufactured slopes of up to 60 feet tall;
- AJ-26 • 1000 foot walls of up to 20 feet tall, extensive fencing, retaining walls and sound walls,
- AJ-27 • not to mention the clustered nature of the development with very high density housing scattered around the project area.
- AJ-28 • The DEIR seems to hugely downplay these impacts and show very vague photo simulations (with far away vantage points) which do not show the true nature of these visual and aesthetic impacts.
- Goes against General Plan policy COS 12.1 (does not preserve hillsides and ridgelines, mass grading of natural landforms).

Air Quality and Green House Gases Examples:

AJ-29 According to the DEIR, the project will have significant and unavoidable air quality impacts and no way to mitigate these impacts.

- AJ-30 • More than doubles the vehicle miles traveled (VMTs).
- AJ-31 • They don't show that a project with fewer units is infeasible.
- They claim green credentials by exceeding Title 24 standards from 2008, but newer standards are currently in place (2013) which are even more stringent (and they do NOT meet these standards). This seems disingenuous or at least erroneous.
- AJ-32 • There's a new executive order put in place by Governor Brown (4/29/15) which requires an even greater reduction of Green House Gases. The DEIR should be revised to show whether or not it meets this new reduction target.

Construction Related Impacts Examples

AJ-33 The construction calls for a large amount of blasting and grading for a period of at least 2 years, and in areas that are in close proximity to houses on hillsides as well as the valley floor. They are also within proximity to livestock and, particularly, horses, which can be very sensitive to noise and vibration. Two years of blasting and grading will be a huge imposition on the local residences and create unsafe situations involving large animals.

AJ-34 • A sound wall will not prevent horses from being spooked by large explosions which can cause a very unsafe situation for horse handlers and riders. It will also destroy the ability for property owners to use their properties in the way they choose (for equestrian purposes, for example).

AJ-35 • The suggested mitigation measure of having livestock moved out of the blasting area every time there will be blasting, is unreasonable and infeasible. Remember, there are over 180 horses in Eden Valley alone. Moving large animals is a complicated and potentially dangerous job. Doing so on a large scale would be very impractical. Several properties adjacent to the project site have 20 to 120 horses onsite at any given time.

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

Thank you for your time.

Jan Denny
2255 Seaquest Trail

AJ-24 This is a repeat of comment AF-22. See Response AF-22.

AJ-25 Response

AJ-26 See Response U-2a regarding the consolidated nature of proposed development.

AJ-27 This is a repeat of comment AF-25. See Response AF-25 regarding characterization of Project impacts and the Project simulations.

AJ-28 See Response K-16 regarding Project consistency with General Plan policy COS-12.1.

AJ-29 The comment is correct in that the Project would result in significant and unmitigable air quality impacts. The Project is incorporating a number of Project design features; however, it is not feasible for the Project to mitigate for cumulative air quality impacts contributed by other projects. No reference amount is provided to justify the commenter's claim that the Project is doubling VMTs.

AJ-30 See Response K-26b with respect to Project alternatives with fewer residential units.

AJ-31 See Response K-27 with respect to compliance with the 2016 Title 24 Energy Code.

AJ-32 See Response K-51 with respect to Governor Brown's issued Executive Order B-30-15.

AJ-33 This is a repeat of comment AF-31. See Response 149a for the requirement to prepare a blasting control plan and Response K-149b with respect to potential impacts to livestock and a Project alternative that minimizes grading and blasting.

AJ-34 This is a repeat of comment AF-32. See Response AF-32.

AJ-35 This is a repeat of comment AF-33. See Response AF-33.

COMMENTS

RESPONSES

Elfin Forest, CA 92029
760-420-7324