

COMMENTS

RESPONSES

**Ehsan, Beth**

**From:** Jan Duncan <janduncan77@yahoo.com>  
**Sent:** Monday, June 15, 2015 1:07 PM  
**To:** Ehsan, Beth  
**Cc:** Horn, Bill; diannejocab@sdcounty.ca.gov; Cox, Greg; ron.roberts@sdcounty.ca.com; Roberts, Dave; bruce.bettyliska@gmail.com  
**Subject:** Fw: EV Bugle - DEIR Comments Due Monday 6/15.

The following is a letter that I can not edit or would do so. I would like to add some comments of my own while I whole heartedly agree with all of the above concerns voiced by other residents in Eden Valley

I live on Eden Valley Rd. I moved here from the coast to escape the traffic, noise and general attitude of mass housing density was well as quiet roads. I and many(most) residents have horses that we enjoy keeping at home but haul out to many areas for competition, trail riding etc. It is my understanding that Eden Valley is a private road the residents payed to have paved. It is already dangerous to pull out with a horse trailer at certain times of the day and may become impossible if it used as an access road for the Valiano project. There is a larger canal that crossed the road which is presently a deep culvert area that you have to drive thru. There are barns and dwellings located closely to the road at it's present size. There is only a small area of the proposed Valiano project that even accesses Eden Valley Lane. Maybe 100 feet while there are other roads that abut much more of the proposed project land.

Additionally there is no way evacuating for a fire down Eden Valley could be accomplished with more homes as it was rough during the fire last year that came into the neighbor. Fire fighting agencies were so overburdened and lacked the resources to adequately defend our area. It was a neighbor with large equipment that went in and cut the fire breaks and actually assisted fighting the fire while a handful of Cal fire people looked, unlocking gates and cutting fences to let him in.

I cannot not find a way that Integral / Valiano can mitigate the traffic, fire, and let's not forget WATER concerns as well as the effect the overconstruction and building on our beloved horses and other livestock in the valley let alone the natural animal residents.

When I moved into the neighborhood I carefully checked what it was zoned for, what was allowed etc. Why aren't the developers held accountable for the same.

The whole area is already not prepared for the Harmony Grove Village starting up now.

Their designated "horse trails" are a joke when it comes to the safety of all using them.  
*Jan Duncan*

On Sunday, June 14, 2015 6:50 PM, Friends Of Eden Valley <edenvalleynews@aol.com> wrote:

AL-1 Introductory comment noted. Please see responses to specific comments, below.

AL-2 The Project would be required to ensure that Eden Valley Lane meets County of San Diego Private Road Standards. Maintenance of this road from Country Club Drive to the Project's entries would be the responsibility of the Valiano HOA. This would reduce the maintenance cost for the existing homes along Eden Valley Lane.

AL-3 The TIA (Appendix H of the Final EIR) found that Eden Valley Lane, which is expected to carry 50 percent of Project trips, was forecasted to operate at acceptable LOS C or better conditions.

AL-4 This comment does not address the adequacy of technical analysis under CEQA. As can be seen in Figure 1-15a, the culvert area would remain.

AL-5 The Project would be required to ensure that Eden Valley Lane meets County of San Diego Private Road Standards. Approximately 50 percent of Project trips would likely use Eden Valley Lane for Project ingress and egress.

AL-6 See Topical Response: Fire/Evacuations regarding fire evacuation.

AL-7 As described in the EIR, the Project would have a less than significant impact with regards to fire protection. The only significant impact to water supply would be visual and biological impacts of the R7 Reservoir, which would be mitigated through M-UT-1. The Project would have significant impact with regards to traffic. Mitigation measures would be implemented for each impact; however, impact TR-3 would remain unmitigated due to the uncertainty of the measures' implementation by another jurisdiction. The Project includes various equestrian amenities, as discussed in Subchapter 1.2. Significant impacts to wild animals would be mitigated, as discussed in Subchapter 2.4.

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- AL-8 Property owners are responsible for conforming to existing zoning requirements unless they are successful in obtaining a rezone or variance from those requirements. These planning options are provided so that private property owners can pursue the use of their property that is most desirable to them. The Project cannot be built as proposed unless the Board of Supervisors approve a Rezone and GPA and certify the EIR.
- AL-9 This comment does not address the adequacy of technical analysis under CEQA. Harmony Grove Village was approved in 2006 and has been under construction. Sales are ongoing.
- AL-10 As discussed in Subsection 1.2.1.2, signage depicting trail safety and rules would be located at strategic places along the trail. The trail is intended to serve equestrian uses, hiking, biking and jogging. The multi-use trail would be built to County of San Diego Trail Design Standards. The trail would run entirely along the community parkway, in addition to connecting with parks and open space.

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Hi all:

For those who still haven't submitted comments for the Valiano Draft EIR, the deadline is **this Monday, June 15 at 4pm**. We really need as many people as possible to submit comments, however brief. Many thanks to all those who have submitted so far.

If you're at a loss for exactly what to say in your comments, we've created some examples (see below) that you might want to use to submit comments across a variety of categories. There should be an intro that explains who you are and why you are writing. And then there are numerous categories of issues you can choose from. I would pick 2 or 3 issues (or more, if you choose) you find most relevant to you and personalize them (paraphrase or whatever). The key is to incorporate anecdotes from your own personal experiences (such as traffic, the fires, community character, rural nature of where we live, etc.) that are personal and relevant to the DEIR.

**Intro Example**

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 \_\_\_\_\_ and I've lived on \_\_\_\_\_ in [INSERT COMMUNITY] for \_\_\_\_\_ 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 JP's major concerns with the project:

*[FOLKS: pick one, two or three of the below major areas of impact that you are most concerned with and then include a personal anecdote that personalizes it. Feel free to paraphrase the text provided (it would be good if you did).]*

**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. This is where the Community Development Model was implemented where our share of this density would form part of a denser village and then the density would feather outwards away from the village limit line, in order to protect the rural nature and the values of our community. *We agreed with this compromise.* This project violates that compromise and it violates the Community Development Model as it creates higher density outside the village core after the "feathering out" has occurred. This is significant.

- **Harmony Grove Village:** Then came New Urban West proposing a massive development. We worked with them over several years to come up with a project that fits in

AL-11 This comment does not address the adequacy of technical analysis under CEQA. Please see responses to specific comments, below.

AL-12 This is a repeat of comment AD-2. See Response AD-2 regarding the need for a GPA.

AL-13 This is a repeat of comment AD-3. See Responses U-2a and AD-3 regarding Harmony Grove Village and Project clustering, as well as community planning efforts.

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AL-13 cont. with the Community Development Model and our community plan previously elaborated with County Staff. It fulfilled our obligation to accept our fair share of density and growth in San Diego County. We played fair because that is who we are. We are not NIMBYS who reject any and all application. HGV is a clear example of that. AND, it maintained the Community Development model by keeping density in "the village" and feathering out with lower density the further you get away from the village. In fact, the lots to the north of HGV right next to Valiano's proposed area, are large lots (some as big as 10-20 acres), as are virtually every surrounding property to Valiano. The majority of the properties are 1 acre or more. So Valiano violates the word AND the spirit of our community plan and the compromise we made by clustering houses closely together in very high density clusters. To approve this increase in density would be a slap in the face to the community and, frankly, would destroy any trust our community (and many others) have in our County administration.

AL-14 • **NC17:** This property had already received an up zone from SR2 to SR1. Then they came back in front of the BOS to ask for yet another up zone to SR0.5. This time, the BOS denied them for the reasons mentioned above: it violates the CDM, this community has already accepted its fair share and it violates the spirit of the agreement we made with county during the general plan process. Now, they are trying a third time to get an up zone. Nothing has changed on the ground since it was rejected the last time. The same logic applies and BOS should not approve this up zone for the same reasons as before.

AL-15 • **Community Plan:** Our community plan calls for a rural community with rural zoning and rural environment. The applicant claims it is a semi-rural development and claim to have rural themes. If houses tightly clustered together, with 1000 foot walls, 20 feet high, manufactured slopes, street lights, fencing and gates and cul-de-sacs can be defined as rural, I think they are looking at the wrong dictionary. Please, look "rural" up in the dictionary. Valiano is not it. For me, rural means... [INSERT MORE OF WHAT RURAL MEANS TO YOU PERSONALLY, EG RANCH FENCING, BARNs, OPEN SPACE, WILDLIFE, ANIMAL SMELLS, SOUNDS ETC.] 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.

AL-16 • **Septic:** Our community plan calls for septic, not sewage treatment plants (again, not rural). This is inconsistent.

**Fire Safety Examples:**

AL-17 I am very concerned about the impacts that this project will have on my safety and those of my community.

- From the DEIR it is clear that they have not taken into account the most recent fire, Cocos Fire. [INSERT PERSONAL ANECDOTE ABOUT THE FIRE]. The DEIR states most fires come from the East, when the last few fires, including Coco's came from the West.
- The 326 houses proposed will make evacuation a very difficult proposition. The DEIR does not show how evacuation will proceed during a wildfire event. The only egress, Country Club Road, will be at LOS F (according to the DEIR) and evacuation on this two lane road will be hazardous and create a fire trap. [INSERT EVACUATION ANECDOTE]. 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

AL-14 This is a repeat of comment AD-4. See Response AD-4.

AL-15 This is substantially similar to comment AD-5. See Responses G-7 and AD-5.

AL-16 This is a repeat of comment AD-6. See Responses G-7 and AD-6.

AL-17 This is a repeat of comments AD-7 and AD-8. See Responses AD-7 and K-59 regarding the Cocos Fire and Topical Response: Fire/Evacuations regarding evacuations.

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- AL-17 cont. 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.
  - AL-18
    - The Fire Protection Plan (FPP) makes no mention of evacuating horse trailers and how that would impact evacuation. Please address this. We have twice as many horses in Eden Valley than we have houses. Trailers are slow, hard to maneuver, big and, importantly very hard to load animals on to. There is only one way out of that valley: Country Club Road towards Autopark way. If the fire comes west, like it did during Cocos there will be a massive traffic jam (LOS F means bumper to bumper traffic in non-evacuation circumstances) that could doom residents to a death trap. This is significant and not mitigated.
  - AL-19
    - 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.
  - AL-20
    - 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.**
  - AL-21
    - They are assuming existing home owners will be responsible for Fuel Modification Zones, an encumbrance to those landowners.
  - AL-22
    - Lastly, the FPP focuses exclusively on the impacts to *the project* but no reference to how it will jeopardize the wellbeing and safety of existing community.
- Traffic Examples:**
- [SEE EVACUATION ISSUES ABOVE]
  - AL-23
    - 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.
  - AL-24
    - The intersection of Country Club and Autopark Way (the main ingress and egress of the project) is already majorly congested. [INSERT ANECDOTE]. 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.
  - AL-25
    - 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.
  - AL-26
    - 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.

- AL-18 See Topical Response: Fire/Evacuations regarding evacuations.
- AL-19 This is a repeat of comment AD-10. See Responses K-199 and AD-10.
- AL-20 This is a repeat of comment AD-11. See Response AD-11.
- AL-21 This is a repeat of comment AD-12. See Response AD-12.
- AL-22 This is a repeat of comment AD-13. See Response I-59 for how the proposed fire protection measures would benefit the whole neighborhood.
- AL-23 This is a repeat of comment AD-14. See Responses K-165 and AD-14.
- AL-24 This is a repeat of comment AD-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.
- AL-25 This is a repeat of comment AD-16. See Response I-61 regarding impacts of the SPRINTER.
- AL-26 This is a repeat of comment AD-17. See Response AD-17.

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- AL-27 [ 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.
  
- AL-28 [ **Equestrian Examples:**  
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.
  - 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.
  
- AL-29 [
  - Shoe-horning horses and stalls onto 1/3 acre lots along with a two story house and garage makes it less likely that the property will be used for horse-keeping. There is barely enough space for a horse to be kept humanely when you include it's food, tack, trailer for hauling, and manure management.
  
- AL-30 [
  - 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.
  
- AL-31 [
  - This project would represent and irreversible loss of Equestrian Capable lands and is incompatible with the current residents community character and existing uses.

**General Plan Incompatibility:**

If the project is allowed to proceed as proposed it will be in direct conflict with at least two of the initiatives contained within the County's Strategic Plan. Specifically:

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

**Visual Character Examples:**

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

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

- AL-27 This is a repeat of comment AD-18. See Response AD-18.
  
- AL-28 This is a repeat of comment AD-19. See Response AD-19.
  
- AL-29 This comment is substantially similar to comment AD-20. See Response AD-20 regarding space for horse keeping and Response AD-21 regarding manure management.
  
- AL-30 This is a repeat of comment AD-21. See Response AD-21.
  
- AL-31 As private land mostly used for agriculture, with the equestrian facility in Neighborhood 5 closed down, the existing Project site does not contain equestrian lands. The Project would add to the equestrian-capable lands of the area, through equestrian amenities such as the public multi-use trail, neighborhood park including staging area and exercise ring, and the trail head park.
  
- AL-32 This is a repeat of comment AF-20. See Response AF-20.
  
- AL-33 This is a repeat of comment AF-21. See Response AF-21.
  
- AL-34 This is a repeat of comment AF-22. See Response AF-22.
  
- AL-35 This is a repeat of comment AF-23. See Responses AD-5 and AF-23 regarding walls, fencing and sound walls.
  
- AL-36 This is a repeat of comment AF-24. See Response U-2a regarding the consolidated nature of proposed development.
  
- AL-37 This is a repeat of comment AF-25. See Responses AF-25 regarding characterization of Project impacts and the Project simulations.
  
- AL-38 This is a repeat of comment AF-26. See Responses K-16 regarding Project consistency with General Plan Policy COS-12.1 and Response AF-22 regarding mass grading.

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### Air Quality and Green House Gases Examples:

AL-39 According to the DEIR, the project will have significant and unavoidable air quality impacts and no way to mitigate these impacts.

- AL-40 • More than doubles the vehicle miles traveled (VMTs).
- AL-41 • They don't show that a project with fewer units is infeasible.
- AL-41 • 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.
- AL-42 • 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

AL-43 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.

- AL-44 • 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).

- AL-45 • 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.

### Where to send your comments before 4pm:

Please email PDS and cc the rest of the contacts below.

To: County Planning and Development Services (PDS) Staff:

- Dave Sibbets: [David.Sibbet@sdcounty.ca.gov](mailto:David.Sibbet@sdcounty.ca.gov)
- Beth Ehsan (assigned planner): [Beth.Ehsan@sdcounty.ca.gov](mailto:Beth.Ehsan@sdcounty.ca.gov)
- Maggie Loy: [Maggie.Loy@sdcounty.ca.gov](mailto:Maggie.Loy@sdcounty.ca.gov)
- Kristin Blackson: [Kristin.Blackson@sdcounty.ca.gov](mailto:Kristin.Blackson@sdcounty.ca.gov)
- Mark Wardlaw (Director of PDS): [Mark.Wardlaw@sdcounty.ca.gov](mailto:Mark.Wardlaw@sdcounty.ca.gov)
- If by mail: 5510 Overland Avenue #110 & 310, San Diego, CA 92123

cc: County Planning Commission:

- [Lisa.Fitzpatrick@sdcounty.ca.gov](mailto:Lisa.Fitzpatrick@sdcounty.ca.gov)
- If by mail: County of San Diego, Planning & Development Services, 5510 Overland Avenue, Suite 110 San Diego, CA 92123

AL-39 This is a repeat of comment AJ-29. See Response AJ-29 regarding VMTs.

AL-40 This is a repeat of comment AJ-30. See Response K-26b regarding Project alternatives with fewer residential units.

AL-41 This is a repeat of comment AJ-31. See Response K-27 regarding compliance with the 2016 Title 24 Energy Code.

AL-42 This is a repeat of comment AJ-32. See Response K-51 regarding Governor Brown's issued Executive Order B-30-15.

AL-43 This is a repeat of comment AJ-33. See Response K-149a for the requirement to prepare a blasting control plan and Response K-149b regarding potential impacts to livestock and a Project alternative that minimizes grading and blasting.

AL-44 This is a repeat of comment AJ-34. See Response K-149b regarding potential impacts to livestock and a Project alternative that minimizes grading and blasting.

AL-45 This is a repeat of comment AF-33. See Response AF-33. See Response 149a for the requirement to prepare a blasting control plan and Response K-149b regarding potential impacts to livestock and a Project alternative that minimizes grading and blasting.

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cc: Board of Supervisors:

- [greg.cox@sdcounty.ca.gov](mailto:greg.cox@sdcounty.ca.gov),
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- Doug Dill: [douglas.dill@att.net](mailto:douglas.dill@att.net)

cc: Town Council: [efngtc@gmail.com](mailto:efngtc@gmail.com)

The Application and D-EIR can be found here:

<http://www.sandiegocounty.gov/pds/regulatory/docs/valiano.html>

Janean Huston & FEVRD

Friends of Eden Valley for Responsible Development

[www.FriendsOfEdenValley.com](http://www.FriendsOfEdenValley.com)

*Save our neighborhood from Irresponsible Development! Donate to our fundraising campaign at [www.GoFundMe.com/FriendsOfEdenValley](http://www.GoFundMe.com/FriendsOfEdenValley)*

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