

COMMENTS

RESPONSES

June 14, 2015

TO: San Diego County Planning and Development Services Staff

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

RE: Valiano Draft Environmental Impact Report: PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2014-MUP-14-019, PDS2013-STP-13-003, PDS2013-ER-13-08-002

BQ-1

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

PUBLIC SAFETY - BICYCLISTS

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

BQ-2

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

TRAFFIC IMPACTS – BICYCLISTS

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

BQ-3

BQ-1 Introductory comment noted. Specific responses to your issues raised are below.

BQ-2 See Response K-165 regarding trip generation onto Harmony Grove Road and Response BF-2 regarding bicycle safety.

BQ-3 Per Table A, Harmony Grove Road west of Country Club Drive has 8,370 ADT. Assuming a typical 10 percent peak hour trip rate, this segment would have 837 trips during the peak hour. As discussed in Response K-218, the Proposed Project's peak hour traffic addition heading west on Harmony Grove Road past Country Club Drive would be 16 trips. An approximate addition of 16 trips to 837 trips would not be expected to make a manageable situation passing cyclists unmanageable. As further discussed in Response K-218, the 16 trips on this segment did not exceed County of San Diego traffic impact analysis guidelines for inclusion in the traffic modeling.

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BQ-4 On a related note, my understanding is the traffic models used in the EIR suggest that very little of the trips associated with the proposed development will be heading west from the development along the Harmony Grove/Elfin Forest Road corridor. This is not a realistic assumption/finding. The fact of the matter is that residents of the proposed development who have destinations on the coast (where jobs, shopping and entertainment are plentiful) will find that the Harmony Grove/Elfin Forest Road corridor is generally more predictable and easier to navigate than the alternatives (Highway 78 or Del Dios Highway). Consequently, the Draft EIR understates to a substantial degree what the true traffic impacts will be along this corridor.

IMPACT OF PROPOSED DEVELOPMENT ON PRIVATELY MAINTAINED INFRASTRUCTURE

BQ-5 Most of the roads in Elfin Forest are private roads, meaning the cost of repairing and maintaining these roads is borne 100% by property owners who live on the roads. The County does not provide resources to help maintain these roads. As more vehicles are added to the Harmony Grove/Elfin Forest Road corridor due to the proposed developments in Harmony Grove, the amount of cut-through traffic on local private roads will escalate substantially, especially when drivers grow frustrated with the congestion they will experience on Elfin Forest Road for the reasons noted above. This will increase the wear and tear on local roads, requiring more frequent and more expensive repair costs for local property owners. The County imposes developer fees and other requirements to offset the impacts and additional costs of maintaining infrastructure due to a development. What about the impact of these developments to our private roads? What is our recourse? At minimum, if the project is approved, the Developer should be required to pay for a portion of the road maintenance costs or pay for the cost of gates to protect private roads from the impacts of these developments.

BQ-6 The list of issues noted above is not meant to be an exhaustive list of my concerns with the proposed development. Indeed, I could spend many more hours of my time and dozens more pages articulating my frustrations and concerns with the proposed project. It does not fit within the character of this community, and its negative impacts on public safety, fire risk, traffic, habitat, and rural quality of life will spread well beyond the boundaries of the development itself. It is unfortunate that the residents of Harmony Grove and Elfin Forest are compelled to spend hundreds of additional hours defending the community vision/plan that we so recently created – all because a single developer wants to profit at the expense of the community. The developer doesn't live in this community, will not have to endure the negative impacts of the project, and apparently has no respect for the community's voice since the proposed development is so out of step with the community plan. I truly hope that the County Planning and Development Services staff, and ultimately the County Board of Supervisors, do the right thing. Listen to the community -- to the residents and voters who live in Elfin Forest and Harmony Grove – and do not approve the Valiano development so long as it does not comply with the community plan.

Sincerely,

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

BQ-4 It is agreed that commuters to Encinitas and Carlsbad would likely choose to travel to/from the west on Harmony Grove Road/Elfin Forest Road; however, trips destined to businesses, commercial centers, or other land uses in San Marcos, Vista, Oceanside, north Carlsbad, and north on I-5 would use SR 78 to reach their destination. Trips to coastal cities and other neighborhoods near or south of SR 56 (Solana Beach, Del Mar, La Jolla) are more likely to use I-15 to reach their destination. See Responses K-165 and K-218 for information on the accuracy of how the traffic models accounted for trips heading west.

BQ-5 The Project would take access from Country Club Drive through Mt. Whitney Road and Eden Valley Lane. The Project would be required to improve these roads to meet County of San Diego Private Road Standards. Mount Whitney Road is a PRD road from roughly the eastern boundary of Neighborhood 1 to Country Club Drive. The remaining portion of Mount Whitney Road is a private road. Eden Valley Lane is a PRD road from Neighborhood 3 to Country Club Drive. As stated in Response BM-1, several existing parcels within the Project site belong to the Eden Valley Lane PRD, and when those parcels are subdivided, the newly created parcels are added to the Eden Valley Lane PRD. In the same way, when existing parcels that belong to the Mount Whitney Road PRD are subdivided, those newly created parcels are added to the Mount Whitney Road PRD. The payments from the new parcels will increase the funds available for maintenance of Eden Valley Lane and Mount Whitney Road. The Project will also be conditioned to enter into a Private Road Maintenance Agreement for the portion of Mount Whitney Road from the Project's primary access point to the start of the PRD. The Project will also be improving a portion of Hill Valley Drive as an emergency access route to the Project, and will be conditioned to enter into a Private Road Maintenance Agreement for the private portion of Hill Valley Drive. Hill Valley Drive would be improved to private road standards (24 feet paved width) if the right of way or easement becomes available for use or purchase; it would then be used as a day-to-day access and not only for emergency purposes. Improvements for Hill Valley Drive as an alternative access road are listed in Subsection 2.8.2.10 of the EIR. The commenter also suggests that increased traffic on Harmony Grove Road/Elfin Forest Road will lead to cut-through traffic on private roads in Elfin Forest; however, the commenter is not specific about which private roads he believes would be affected. As stated in Responses K-163 and K-165, the Project is not expected to contribute significant traffic to westbound Harmony Grove Road/Elfin Forest Road; therefore, the Project would not generate significant cut-through traffic on private roads in that area.

BQ-6 Your position regarding the negative effects of the Project and the developer's lack of respect for the community is hereby included as part of the record. Your request for the decision-makers to deny the Project

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BQ-6
cont.

also is hereby made available to the decision makers prior to the final decision on the Project.