

COMMENTS

RESPONSES

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Re: Valiano Specific Plan, SCH NO. 2013061042—Public Comments on Draft Environmental Impact Report

Ms. Ehsan and County of San Diego Planning & Development Services Staff,

I live at 2952 Milpas Drive and have been an Eden Valley resident for 13 years. This is a very stressful time for my family and community as we feel that the Valiano project by Integral Communities is threatening to destroy our treasured rural lifestyle that Eden Valley residents have enjoyed since the early 1900's. This area is unique in San Diego County and the communities of Eden Valley, Harmony Grove, and Elfin Forrest are some of the last remaining rural to semi-rural communities west of Interstate 15.

As I reviewed the DEIR, it is apparent to me that Integral studied the minimum amount required by the County of San Diego. In this EIR there appears to be a focus on ensuring the highest density possible and there is little focus on the safety of the future Valiano residents and surrounding communities. For example, the numerous waivers regarding fire safety standards.

While reviewing the DEIR documents I have found numerous pieces of erroneous information and descriptions which are misleading. I have attempted to note many of them in the following response:

Project Description

1. The project is described as being a Smart Growth project. However, in the video I sent the county staff of the NC17 hearing, it is clearly stated that the project does not lie within the Smart Growth areas. All mention of Smart Growth should be removed from the EIR as this project does not meet the stringent Smart Growth standards.
2. The distances in paragraph 1 of section 1.2 are inaccurate. I have found distance inaccuracies throughout the DEIR. I checked distances via Google maps to be shorter than distances calculated via Google maps. Most are one or miles off. This is very misleading when reviewers, who may not be familiar with Eden Valley, read them.

CC-1 The comment is introductory in nature. Appreciation of your community is understood.

CC-2 The Safety Element of the General Plan addresses the natural hazards and human activity that may pose a threat to public safety in the areas of wildfires, geologic and seismic hazards, flooding, hazardous materials, law enforcement and airport hazards. The Project has been reviewed for safety in all of these areas. This Specific Plan is consistent with the 15 goals of the County's Safety Element. Also, an FPP was prepared for the Project (Appendix L of the Final EIR). The FPP was reviewed in detail by the San Marcos Fire Department and subsequently approved.

CC-3 See Responses D-1 and D-4a regarding the Project proximity to Smart Growth areas and consistency with Smart Growth principles.

CC-4 Using Google Maps, distances better described in driving distance have been revised in the Final EIR.

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CC-4 cont.	<p>For example, the opening descriptions states, "The Project site is located approximately 1.7 miles west of Interstate 15 (I-15) and 0.6 mile south of State Route 78." According to Google maps the distance from Valiano's Eden Valley Lane entrance to State Route 78 is 1.4 miles or a five minute drive time without traffic.</p> <p>Every distance cited in the DEIR needs to be rechecked.</p>	
CC-5	<p>3. "The Project site is generally divided into two areas, a larger northwestern portion of approximately 191 acres and a smaller southwestern portion of approximately 48 acres. The two areas connect corner to corner (Figure 1-2, Aerial Vicinity Map)."</p> <p>To say these two properties adjoin each other is a reach. The two properties may share a few feet of property line. However, Neighborhood 5 is completely separate from all the other neighborhoods and will be accessed from Country Club Drive only. Residents from Neighborhood 5 will have to leave that area via a separate entrance and enter into another Valiano entrance to reach some of the project facilities. This is more like two communities rather than one. A design that unites these communities should be studied.</p>	CC-5 As described in the Project documents, the two areas of the Project site connect "corner to corner." The public trail that begins in the southeast corner of Neighborhood 5 and extends to nearly the northeast corner of Neighborhood 4 further establishes the two areas as one larger Project (see Figure 1-18).
CC-6	<p>4. "Building styles within these neighborhoods would include a variety of architectural themes and styles, including Craftsman, European Cottage, Mission, Monterey, Spanish and Italian (refer to Subchapter 2.1, Aesthetics, Figures 2.1-6a through 6f). Proposed residential units would vary in architectural details; however, the architecture is intended to be compatible with the semi-rural ranch setting found in the existing valley and surrounding area."</p> <p>How the mentioned architectural themes and styles compatible with Eden Valley's semi-rural ranch setting? Most of the styles mentioned are found in village type developments and not in rural settings. Ranch style architectural themes should be studied. In addition, single story homes should be mandated for any homes set on highpoints or ridgeline in the valley to lessen their visual impacts.</p>	CC-6 The sentence was meant to include both concepts, that the proposed architecture would be variously compatible with the semi-rural ranch setting as well as the surrounding area. The properties surrounding the Valiano Project vary in theme, look and feel. The intent of the architectural guidelines in the Specific Plan is to offer a similar variance in theme, look and feel. The Applicant has proposed a D Designator in its Zoning which would require architectural plans to be reviewed by the County of San Diego through the Site Plan process prior to approval. Views in the valley are enjoyed both to the east and the west, and the elements of these varied architectural styles are found particularly in the hills east of Country Club Drive (although they may also immediately edge the road such as the tile roof homes found in the vicinity of the intersections of Country Club Drive and Kauana Loa Drive or Live Oak Road). Other rural architectural elements such as barn themes for the WTWRF and rural fencing patterns are also anticipated for the Project.
CC-7	<p>5. Since neighborhood 3 is situated next to the equestrian trail loop, the trailhead park, and the Hunter Equestrian Center it should consist of ½ acre or larger lots to facilitate horse keeping. This may help alleviate conflicts between new urban residents and existing rural residents.</p> <p>To further alleviate conflicts between existing and new residents, a design that places larger ½ acre to 1 acre lots next to all existing Eden Valley residents' properties should be studied.</p>	No proposed home sites are located on main ridgelines. Those are located to the west of the Project. Some homes are located on topographic rises within the Project. Although some homes may be single-story in these areas, this is not required to preserve valued view elements. These homes would be "back-dropped" by higher hills to the west (for viewers from the east) or by the extensive views of valley and lower hills (and ultimately higher ridgelines at distance to the east (for elevated viewers to the west). Overall, and particularly for viewers from the valley floor and east, the most "visible" homes would be those located on the lower slopes of the western ridge line. Those homes also would be the most distant from the viewers, with their size and design specifics minimized by distance. Also see Response K-11c.
CC-8	<p>6. Neighborhood 1's description should include the number of condominiums that will be part of that neighborhoods design.</p>	
CC-9	<p>Given the fact that many of the other neighborhoods will have secondary dwelling units, which county staff has said can be rentals, I do not see the need for the 49 condominium units. These do not fit into a semi-rural environment and are an urban development component found miles</p>	

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| CC-7 | See Response BP-4 regarding lot size and animal keeping. In order to address conflicts between existing and new residents, the Applicant has proposed a landscape buffer area. As noted in the Specific Plan Section 2.0 (Land Use and Design), buffer landscape is described as a buffer landscape edge that would be planted along several property boundaries to provide an attractive visual and dimensional separation between the existing adjacent residential lots and the new proposed residential lots. Planting of trees and shrubs would be designed in a manner to provide a soft and appealing edge between the Project and existing homes. In addition, Neighborhood 3 has been redesigned to remove the homes proposed along the northern edge, providing additional buffer between proposed homes and existing homes to the north. |
| CC-8 | Thank you for suggesting this clarification. Section 1.2 of the Final EIR has been revised to provide additional description for each product type within Neighborhood 1. |
| CC-9 | The Project would satisfy the County's affordable housing requirement by offering a variety of moderate housing types such as large single-family homes, small single-family homes, and accessory dwelling units which are ideal for multi-generational families. The detached condo lots are required to fulfill the affordable housing requirement because the accessory dwelling units are optional and may not be built. |

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CC-9 cont.	<p>away from Eden Valley in city areas such as Escondido and San Marcos. As I understand it, the secondary dwelling units can satisfy the affordable housing requirements.</p> <p>The removal of all of the condominiums should be evaluated for the reasons stated above.</p>	
CC-10	<p>In addition, the secondary dwelling units did not appear to be included in the traffic study. The traffic study should be redone to include the traffic from the secondary dwelling units.</p>	CC-10 The TIA (Appendix H of the Final EIR) conservatively accounted for 54 accessory dwelling units and 334 single-family homes, which is more than the Proposed Project, as such, a revision to the study is not warranted.
CC-11	<p>7. The trail head in Neighborhood 3 appears to terminate at the Hunter Equestrian Center's property line. The trail is supposed to connect to the private road that shares Neighborhood 3's northern property line.</p> <p>The trail head needs to be reconfigured to allow northern Eden Valley residents access to the trail system.</p>	CC-11 The Plan depicts the termination of the trail head in Neighborhood 3 at the north east corner of the property, directly adjacent to the private road (see Figure 1-18). The trail head location allows northern Eden Valley residents access to the trail system.
CC-12	<p>8. "The existing equestrian complex previously used in association with the Harmony Grove Equestrian Center, located in the southern portion of Neighborhood 5, would be retained, open to the public and privately maintained. Portions of the existing equestrian training and boarding facility would accommodate private horse boarding. The 0.2 acre site would be reconfigured to allow public horse trailer parking and use of an exercise ring for the public to access the multi-use trail."</p> <p>A 0.2 acre site is extremely small to facilitate all the mentioned activities. Even a two acre site, assuming this is a typo, seems small for such an operation. This area should be increased to 5 acres or more to properly operate as a boarding facility and public riding space.</p>	CC-12 The equestrian staging site would accommodate the additional horse trailer parking and exercise ring by expanding to 1.2 acres. Private horse boarding is no longer proposed, because horse boarding facilities already exist in the vicinity and adding one more would not serve a community need. See Section 3.1.6.2 and Figure 1-12.
CC-13	<p>9. Who will be responsible for the care and maintenance of the equestrian center? If it is the HOA, what guarantees can be made that this facility will remain open and viable. This entire concept is welcomed, but it requires further study to ensure it does not become abandoned or sold off for more development.</p>	CC-13 The equestrian center would no longer have boarding as described in the DEIR, and would consist of a parking area and equestrian exercise pen. These amenities would be maintained by the Valiano HOA.
CC-14	<p>10. To facilitate a sense of a community, all parks and recreational facilities should be open to existing residents of Eden Valley and Harmony Grove. Having parks that are restricted to Valiano residents will not foster integration with the existing community.</p>	
CC-15	<p>11. "The proposed agricultural easement area currently includes avocado orchards, portions of which were damaged or destroyed by a recent (2014) wildfire."</p> <p>First of all, nearly all of the avocado orchards were destroyed by the Cocos fire. The small portion of grove that was not destroyed have since died due to lack of water (the fire burned all of the above ground irrigation). Secondly, the Fire Protection Plan states that there have been no major wildfires in 50 years and yet here is a statement in the project description that notes fire damage from the 2014 Cocos fire. It is obvious that the applicant is aware of the 2014 Cocos</p>	CC-14 When conducting a GPA, an applicant is required to provide a certain amount of dedicated park land (373.74 s.f. per dwelling unit). In this case, the Applicant is required to provide 2.79 acres of park land. According to Specific Plan Table 2.1 (Summary of Park Acreage Type & Credit), the Applicant has provided 2.88 acres of Public Park in addition to 5 acres of private facilities. The Applicant has provided a total of 7.88 gross acres of public and private parks, with a net acreage of 3.2 acres as calculated by the Park Lands Dedication Ordinance (PLDO). The PLDO allows for a combination of public and private parks in order to serve both the new residents and surrounding community. Although privately maintained, several of the parks are accessed via the public trail system and useable by the surrounding neighbors.

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<p>CC-15 cont.</p>		<p>fire and chose not to study it. This brings into question their motives and desires to ensure they build a project that has the public's safety and best interests in mind.</p> <p>The Cocos fire, as well as all other local fires that have occurred in the local area, need to be studied. Eden Valley has its own weather patterns due to topography which have a dramatic effect on fire behavior.</p>
<p>CC-16</p>		<p>12. Eden Valley lane is designated as one of two points of entry to the project for Neighborhoods 1 through 4. Approximately 500 feet from the intersection of Eden Valley Lane and Country Club Drive is an Arizona crossing which floods in times of heavy rain. I have not seen any mention of the Arizona crossing in the DEIR.</p> <p>The Arizona crossing needs to be studied to see if a bridge will be necessary to ensure road access in times of heavy rain.</p>
<p>CC-17</p>		<p>13. Having only two access points plus one emergency access point that all lead to Country Club Drive, a two lane, traffic calmed, country road seems inadequate. Country Club is also the fastest route to State Route 78 for the residents of Harmony Grove Village. In the traffic section of the DEIR, Country Club Drive is noted as having a rating of LOS F. This will have a dramatic impact on emergency response times which do not appear to have been studied with the expected road rating.</p> <p>All emergency response times should be calculated based on the LOS F rating for Country Club Drive. In addition, a full emergency evacuation plan should be studied to ensure all residents can evacuate the area in a timely and safe manner given the known fire behaviors in the valley.</p>
<p>CC-18</p>		<p>14. Lighting – Residents of Harmony Grove and Eden Valley have learned many lessons from Harmony Grove Village. One of those lessons is that the county may need to install additional lighting on road segments outside the planned development to ensure safety given the additional traffic volume brought in by the development.</p> <p>As the additional lighting outside the project is triggered by the population growth of the proposed project, the EIR should study where such lighting will be required and present those locations. Those additional lights will have a direct impact on existing resident's enjoyment of dark night skies and will create a visual impact.</p>
<p>CC-19</p>		<p>15. Grading – This project is proposing a massive amount of cut and fill grading. Given its extreme proximity to existing homes and the community of Eden Valley, this activity is going to have a dramatic impact on the existing community. In particular, there are several areas noted in the grading plan where blasting will occur adjacent to existing homes.</p> <p>Currently there are residents fighting with the Harmony Grove Village developer over property damage that occurred during their grading operations. The applicant should appraise all homes in the immediate area of the blast and grading sites prior to starting grading or blasting operations at the applicants cost. Once the existing residents and the applicant agree that the</p>

<p>CC-15</p>		<p>See Response K-5 regarding the destroyed avocado orchards. In addition, Section 1.4.4 of the FPP has been revised to address the Cocos Fire. Fire behavior modeling was completed for on-site and off-site native mature fuels during worst-case scenarios considering local weather patterns (e.g., for late summer strong winds northeast winds [Santa Ana] and late season, strong south to southwest winds).</p>
<p>CC-16</p>		<p>As described in Response Q-2, the Project would provide on-site detention basins to match existing storm water flows from the Project site. Therefore the Project would not increase flows at the existing "Arizona" crossing on Eden Valley Lane.</p>
<p>CC-17</p>		<p>See Topical Response: Fire/Evacuations regarding fire evacuation.</p>
<p>CC-18</p>		<p>The locations of Project-proposed street lights are depicted on EIR Figure 1-30. Discussion of Project lighting, "dark skies" and potential light spill are provided in the EIR. See Responses U-2a and AG-1. No additional lights are proposed as part of the Project outside of the Project and additional discussion is not required.</p>
<p>CC-19</p>		<p>The Applicant is required to prepare a blasting plan to reduce impacts of blasting as explained in Responses K-148 and K-149a.</p>

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<p>CC-19 cont.</p>		<p>appraisal is accurate, the applicant could begin the grading activity. This will provide home owners a way to prove that any damage that occurs due to blasting or grading was directly related to the applicant's activity. Alternatively, the county should provide guidance to homeowners about how to protect their property from these activities.</p>
		<p>Aesthetics</p>
<p>CC-20</p>		<p>1. The density of the proposed project does not match the densities of the surrounding communities. Even the Harmony Grove Village lots that adjoin the proposed project area are large lots. This project should be scaled back to better match the existing communities of Eden Valley and Harmony Grove.</p>
<p>CC-21</p>		<p>2. Image in Key View 1 in PDS2013-SP-13-001-DEIR-Chap2.1-Aesthetics-pt6.pdf shows an existing cut in the hillside up in Coronado Hills (there are several not seen in this photo) and clearly shows that vegetation does not regrow in those cuts (that cut is more than 13 years old – the length of time I have been an Eden Valley resident). This is due to the large amount of decomposed granite and granite rock which support very little plant life once native soils are stripped. There are an extensive number of steeply graded slopes within the project plan and they will be a visual impact for decades. More studies should be performed regarding how these visual impacts will be mitigated in both the near and long term. In addition, more studies should be conducted to see if the number of such cuts can be limited.</p>
<p>CC-22</p>		<p>3. It is proposed that all retaining walls will be planted or hidden with vegetation and their visual impacts mitigated once plantings reach maturity. As seen in the above mentioned photos, cuts and retaining walls will most likely appear as scars on the landscape for decades to come, not a mere 5 years as noted.</p> <p>The number of cuts and retaining walls should be minimized. I also noted that there is one continuous retaining wall that will be over 1,000 feet long and average 20' tall and other graded slopes in excess of 60' tall. These will be visible from most, if not all, of Eden Valley. They will also be visible from major highways, local trails, a good portion of Escondido, and from parts of San Marcos. It is a major visual impact and I do not see how it can be mitigated knowing that plant life does not take when planted into graded areas that already exist in Eden Valley. If the plan is to use trees, very few trees grow well in granite and will take decades or more to reach maturity.</p> <p>These cuts, retaining walls, and steeply graded slopes need further study to see what plant species will grow there and how long it will take them to reach maturity.</p>
<p>CC-23</p>		<p>4. In the same document, photo simulation A is inaccurate as the homes in the background appear much larger than the homes that are supposed to be in the foreground. The photo simulations should be re-done to more accurately reflect the size of the proposed homes at the scale matching the photo they are placed into.</p>

<p>CC-20</p>		
<p>Although specific lot sizes vary throughout Harmony Grove Village, the proposed gross density is approximately 1.6 du/acre. Valiano would be approximately 1.4 du per gross acre. The proposed density is in the semi-rural range, as is Eden Valley. See Responses K-11b and AD-3 regarding visible variation in lot sizes of less than 1 acre along Country Club Drive and within Eden Valley. Specifically as described in EIR Subsection 2.1.2.1 relative to immediately abutting lots:</p> <p><i>The Proposed Project would group residential lots to limit the impact footprint and provide large areas of open space and retention of semi-rural on-site visual resources. As a result, residential lot sizes generally would be smaller than those at surrounding residential development and absent design considerations, there is the potential for the development to contrast with the relative scale of existing surrounding development. However, the Project incorporates several site design features to reduce massing effects. By grouping homes, large areas of visual open space would be provided. ...[This would include] existing on-site elements such as mature tree stands, steep hillsides, riparian areas, native habitat, [remnant] avocado orchards and a pond. The features within the proposed open space network would provide visual buffers within and between proposed residential neighborhoods to reduce massing effects.</i></p> <p><i>Proposed Project landscaping would also provide screening of the residential development, thereby reducing perceived massing. Extensive landscaping, utilizing species consistent with the existing character of the Project area, would be planted along the site perimeter, along Project roadways, within residential neighborhoods, within parks and recreation uses, and in Project affected visual open space areas...</i></p> <p>The combination of notable and visible open space at Project perimeters (including agricultural easement, retained oaks and biological open space easement, Neighborhood Park, etc.), combined with the large amount of landscape buffering between Project lots and adjacent parcels would minimize visual effects related to inconsistency in lot size to less than significant levels.</p>		
<p>CC-21</p>		
<p>Single-family homes do not need to comply with the County RPO provisions to protect steep slopes that are required of subdivisions and tentative maps. Private property owners also enjoy more leeway in their landscaping plans than developers, and this is likely the source of the highly visible cuts noted in the comment (although it should also be noted</p>		

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- CC-21
cont. that home appears to be in the City of San Marcos and not within County jurisdiction). Most of the cuts in the Project would be behind homes, and thereby shielded by these structures and accompanying vegetation. Where cuts would be located above the individual lots, maximum slopes would be at 2:1 gradients which can be easily planted and would be subject to homeowner and/or association maintenance requirements as part of the required revegetation/landscaping plan. See also Response AD-5 relative to the Project tallest slope, abutting vegetation, and additional mitigation which would result in the slopes either not being visible or blending with adjacent natural slopes post-landscaping maturity.
- CC-22 Light-colored walls can draw the eye when surrounding areas are darker in color. This also occurs for cuts into vegetation as described in this comment as well as CC-21. Proposed Project retaining walls would be located behind homes and/or landscaping that would largely or wholly shield them or are proposed for architectural treatment (staining/coloration) to reduce visibility. Regarding overall visibility of these walls, see Response AD-5 regarding walls and fencing. Retaining walls received focused review in the EIR in Subsection 2.1.2.1 under the heading “Retaining Walls.” Specifically regarding perimeter walls, the analysis detailed information on walls that would edge the Project perimeter, but would not be landscaped based on the Project Conceptual Landscape Plan. The reader should note that two of those walls, identified as “adjacent to an unpaved and unnamed street north of Surrey Lane (10 feet and 11 feet in height) that would be located perpendicular (i.e., along the line of sight) to viewers,” have been deleted from the Project following public review as the lots with which they would have been associated were deleted.
- Where impacts remained potentially significant, the coloration required as mitigation, combined with a low number of potential viewers, and the distance from the viewers, as well as potential for intervening vegetation or landscaping resulted in these four isolated features being mitigated to less than significant impacts.
- As discussed in Response AD-5, the cuts and walls would be largely shielded from off-site viewers. Although the development overall would be visible from points east and north, as noted in this comment and illustrated on the viewshed in Figure 2.1-5, these views become increasingly distant or diluted, with substantial intervening view elements to draw the eye. Although generally obscured by intervening topography and development, remaining views from SR-78 and I-15 would be fleeting, as they would be experienced at highway speeds, with substantial distraction provided by nearby traffic, as well as closer view elements (development abutting the highway facilities). As demonstrated in EIR Figure 2.1-4e, views from the public trails in Elfin Forest Recreational Reserve and Del Dios Highland Preserve would place the Project in far middle ground, behind existing development and the growing Harmony Grove Village development. Even the ridgeline/skylined residences

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- CC-22
cont. above the Project, that generally draw the eye, are minimized from this distance. Development associated with the Proposed Project is expected to blend into the existing condition. Closer trails largely would be developed by the Project, and as such, would include the Project as an existing condition at the time of implementation.
- The Project landscape plans require as a matter of course that adequate soil preparation occur to support the proposed plantings. This is not required of existing individual homeowners, which has resulted in the cuts that remain and are so highly visible.
- CC-23 The sizing of the homes in the photosimulation is accurate. The 3D modeling software used accurately depicts the size of the homes in terms of height and width from the selected viewpoint based on the architect's drawings. The Project includes two story homes set back into the hillside, which minimizes the horizontal footprint of each home when compared to the large estate homes at higher elevations. As described in Response AF-25, those ridgeline homes are also often presented "full length" or broadside to the viewer in the valley below, and some have little shielding landscaping. The Project homes are often at oblique angles as they follow streets that conform to the curves in the hillside, and do not always present "straight-on" views. They often are also obscured by the mandated Project landscaping, which includes both shrubs and trees. All of these factors result in the Project homes appearing smaller than those located above them on the hills. The relative impact can be seen as conservative when the Project homes are compared with the size of the existing homes backed by the large unvegetated cut slope referred to in comments above within this letter.

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Hazards

CC-24

1. There are several references to section 3.1.8, yet there is no section 3.1.8 in the DEIR. While I was able to figure out what the correct section was, this may have been very confusing to area residents who attempted to read through and follow references in the DEIR.

CC-24 Thank you for pointing out the errors. These references have been fixed in the Final EIR.

2. As determined by the State Fire Code, fire severity is zoned as "Very High" fire severity for some portions, and "Moderate" for the remainder of the Proposed Project site (located approximately 11 miles inland from the ocean). Several characteristics of the Project location, including topography, vegetation, and climate zone contribute to risk of fire at the site.

CC-25 See Topical Response: Fire/Evacuations regarding fire evacuations and K-59 regarding analysis of the Cocos Fire in the FPP. Implementation of the Project would not cause the Fuel Hazard Severity Zone to be increased as the Project would replace combustible native vegetation with features such as ignition-resistant landscaping, ignition-resistant building construction features, fire hydrants, access roads for fire safety personnel to combat any fire potential and FMZs (see Response I-59 for more information).

According to the fire severity maps, the project area is set as a "Moderate" fire severity zone. This is most likely due to the fact that the current project area consists of grasslands with some wooded areas and agricultural lands which are assumed to be watered regularly. The entire area surrounding the project site is listed as a "Very High" or "High" fire severity zones due to the known fire hazards of the area and the number of existing homes that are in these high fire areas (as the FPP notes, populations are often the source of ignition for wildfires). Once Valiano is built, I believe the area will also be rated as a "Very High" or "High" severity zone and this should be studied.

In addition, the map showing the fire severity zones clearly shows ingress and egress routes of the Valiano project area as having to cross through "Very High" severity zones. This is a key point of review. As we saw in the Cocos fire, had the Valiano project been complete, residents would not have been able to evacuate via Mount Whitney Road as it was on fire. The fire jumped in many places along Mount Whitney and also jumped across to Koana Loa which blocked that route for evacuation. This left one way out, traveling north on Country Club Drive which terminates at the intersection with Auto Parkway which is currently an impacted intersection that often times requires Eden Valley residents to wait one or two light cycles to be able to make a left turn to reach State Route 78.

According to the DEIR traffic section Country Club Drive will be at LOS F – essentially bumper to bumper traffic that is flowing. So how will the residents of Harmony Grove, Eden Valley, and those in the new Valiano project escape a fire such as the Cocos fire? In addition, given the fact the there are more horses and large animals in Eden Valley than there are homes, the roadways will be further impacted with people pulling large trailers as they evacuate their animals. The Fire Protection Plan appears to not have study evacuation routes at all which is a major oversight given the fact that the Cocos fire provide a recent example of area fire behavior and how well the roadways were able to evacuate current residents.

For this reason alone the Fire Protection Plan and the hazards section of the DEIR need to be re-written and the events that led up to, during, and after the Cocos fire need to be studied in detail.

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<p>CC-26</p>	<p>3.</p>	<p>“Several characteristics of the Project location, including topography, vegetation, and climate zone contribute to risk of fire at the site.” The hazard section notes the unique features of Eden Valley that contribute to fire risk, yet the FPP does not study them. Instead it uses regional modeling which is inaccurate when applied to Eden Valley.</p> <p>A new FPP that studies the specific area and conditions needs to be performed. This is particularly important given the fire behavior observed during the 2014 Cocos fire which burned more than 90% of the project area and other local fires that have threatened the project area.</p>
<p>CC-27</p>	<p>4.</p>	<p>“In the FPP, several scenarios were developed to determine the potential fire behavior of a wildland fire that might occur in the vicinity of the Proposed Project.”</p> <p>The FPP is inaccurate at best as it only studied fire dangers during Santa-Ana winds. As previously mentioned it did not model the local area nor did it study the most recent Cocos fire which burned more than 90 % of the project area. Given this recent fire, the FPP should be redone to take into account the local area, its weather patterns, and a thorough study the Cocos fire which was driven by a west wind when it burned Eden Valley and Harmony Grove.</p>
<p>CC-28</p>	<p>5.</p>	<p>“The FMZ shall be a minimum of a 150-foot area, or as approved by the SMFD, surrounding and extending in all directions from all structures, in which flammable vegetation or other combustible growth is cleared away or modified”</p> <p>The FMZ should be contained within the applicant’s project area. Currently it overlaps neighboring properties and they do not have easements to create such an encumbrance on those properties. This can be easily remedied by the applicant removing the homes whose FMZ exceeds the project area.</p>
<p>CC-29</p>	<p>6.</p>	<p>“All newly constructed structures would be built to ignition-resistive building requirements, as specified in the FPP. The installation of automatic interior fire sprinkler systems would be required (per National Fire Protection Association Standard 13D and 2013 California Building Standards Code). All glass or other transparent, translucent or opaque glazing materials, including skylights, shall be constructed of tempered glass or dual glazed windows with minimally one pane of tempered glass.”</p> <p>As a former fire fighter, I have witnessed every one of these protections measures fail during a wildfire. Most are good measures to protect a home that suffers a small internal fire, such as a kitchen fire and are designed to give firefighters time to extinguish a house fire before it spreads to neighboring homes – but they do not protect from the type of temperatures generated during a wildfire.</p> <p>During the 2007 Witch fire I worked in the North/West corner of Ramona where supposed “shelter in place homes” were constructed to standards that exceeded the codes mentioned in the above quote. They suffered an approximate 80% loss in that neighborhood and surrounding areas. Interior fire sprinklers are only effective if they have water pressure, however during a</p>

<p>CC-26</p>	<p>The fire behavior parameters and projections for the historic and existing hazardous vegetative fuels on- and off-site were calculated for the Proposed Project. These calculations were used for recommended fuel modifications and the evaluation of wildfire threat to the Project.</p> <p>The FPP calculated fire behavior parameters that were key to recommended fuel modifications for the development, but they are also based on Project site observations, experience, and fuel levels and typical fire behavior observed during local fire seasons. Modification and/or elimination of hazardous fuels and the reduction of fuel loading for the Project are key to “firewise” planning for the Project site and the surrounding communities. A new FPP would not be necessary.</p>
<p>CC-27</p>	<p>The FPP addressed scenarios such as the Cocos Fire, which experienced south to southwest prevailing winds in hot dry weather conditions in high load, dry climate shrub and other non-native fuels (e.g., avocado orchards). Also see Response CC-26.</p>
<p>CC-28</p>	<p>See Response I-49 regarding off-site fuel modification zones.</p>
<p>CC-29</p>	<p>In order to ensure that interior fire sprinklers are effective when there is heavy use of fire hydrants within the proposed Project, all fire hydrants serving the proposed development shall be capable of supplying a minimum of 1,500 gallons per minute fire flow for a 2-hour duration at 20 psi residual pressure. This requirement ensures that waterlines for fire control must be capable of supplying this required demand through the hydrants, in addition to the largest fire sprinkler demand. An additional requirement to ensure that fire control and sprinkler demand is met, when an on-site waterline serves more than two hydrants, the line must be looped, providing two hydraulically remote points of connection with the water district lines. The interior loop must have isolation valving, such that not more than two hydrants and/or sprinkler systems are between isolation points. If the on-site fire water system for a building is a private loop, the two points of connection are needed to the public supply and appropriate fire department connections.</p> <p>The minute-by-minute movement of a wildland fire is never fully predictable, and is certainly not predictable from a weather conditions forecast many hours before the fire. Nevertheless, practice and</p>

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<p>CC-29 cont.</p> <p>wildfire when firefighters are drawing large amounts of water from hydrants the local water pressures drop which makes sprinkler system in-effective. I did see homes where the sprinkler systems saved the area that the water spray could reach, while the surrounding areas within the same home were a complete loss. I have also seen tempered glass melted due to the temperatures of a wildfire. An additional issue is the transfer of heat through widows and other weak points in the structure. It is not unusual for this transfer of heat to ignite items inside the home which are near windows and other areas where heat penetrates the home – they then literally burn from the inside out. Other issues include wood fencing which literally leads a fire to a home, yet fencing is rarely reviewed when looking at fire protection measures.</p> <p>When a wildfire approaches an area where there are homes present, fire fighters generally move into a structure protection mode. This means that one or more engines are stationed at each home being threatened by the wildfire and they begin trying to do all they can to ensure the home does not ignite. However, when there are lots of homes facing a wildfire there are not enough firefighters or engines to protect every home and this protection measure is quickly overwhelmed. To avoid this scenario, areas in the wildland urban interface should consist of a sparse number of homes making them more defensible.</p> <p>Large scale developments in the wildland urban interface should not be allowed. These types of developments have historically suffered large losses of property and have also caused loss of life on many occasions. The project plan should evaluate reducing the number of homes that lie in the wildland urban interface.</p>	<p>CC-29 cont.</p> <p>experienced judgment in assessing the fire environment, coupled with a systematic method of calculating fire behavior, yields very good results in terms of protecting structures and lives within wildland urban interfaces.</p> <p>Whenever a fire's flame length, one to-two minutes in duration or more, is equal to or more than the separation of combustible vegetation column, ignition of a vegetation column may occur. However, the required vegetation reduction and management within the defensible zone around each proposed Project structure does not support ignition of structures in the development with radiation, conduction, or convection heat sources. In addition, it does not support melting tempered glass nor the ignition inside a house through a window or other weak points in a structure. Fire agencies consider vegetation management as a principal approach to wildland fire hazard reduction for protecting structures and lives.</p> <p>The FPP states that fences and other structures fewer than 5 feet from a building shall be non-combustible construction, heavy timber or fire retardant pressure treated wood to prevent an ignition of the structure.</p> <p>See Response CA-2 regarding Project fire protection measures that would significantly improve the safety of Project residents and surrounding neighborhood. This would be true whether structures more sparse or within a wildland urban interface area.</p>
<p>CC-30</p> <p>7. Lots with reduced defensible space – I am gravely concerned at the number of waivers being granted to the applicant in regards to fire protection. Perhaps these were granted due to the inaccuracies portrayed in the FPP? Given the fact that Eden Valley and Harmony Grove are surrounded by areas rated as “severe fire danger” and the data from the recent Cocos fire, all waivers should be rescinded to ensure the safety of area residents as well as those who might purchase a home in the proposed project. There are simply too many exceptions in this DEIR that raise the possibility of loss of life and property.</p> <p>The applicant should take a closer look at the safety of this proposed project and redesign a project that puts safety before density.</p>	<p>CC-30</p> <p>Lots with reduced defensible space would be required to implement enhanced fire protection features that would provide adequate protection as explained in Response AZ-14.</p>
<p>CC-31</p> <p>8.</p> <p>The Proposed Project is located within a Local Responsible Area (LRA) served by the San Marcos Fire Department (SMFD). SMFD's capacity to provide fire protection services to the Proposed Project is discussed in more detail in Section 3.1.8, <i>Public Services</i>. Escondido Fire Department (EFD) and County Service Area 107 (Elfin Forest) also have fire protection facilities within the area; SMFD has established several mutual and automatic aid agreements with these surrounding fire departments, as discussed in Section 3.1.8.</p>	<p>CC-31</p> <p>See Response BJ-7 regarding automatic aid agreements and service to the Project from the new Harmony Grove Village fire station.</p>

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CC-31 cont.	<p>It has recently come to light that CSA107 will not be merging with Rancho Santa Fe Fire. Instead Cal Fire and San Diego County Fire Authority will be handling it which may involve staffing by volunteer fire fighters. I have not seen any response or attempts to contact proper authorities in either of these organizations regarding the heavy dependency the proposed Valiano project has on the new Harmony Grove Village fire station. It is for this reason I feel that the FPP and the DEIR need to be re-evaluated and inclusive of these organizations.</p>	
CC-32	<p>The FPP also needs to study the number of apparatus and staff that will be present at the Harmony Grove Fire Station (as well as other surrounding mutual aid stations in Escondido) to ensure there is enough to support mutual aid calls. Just because a station or fire protection district agrees to mutual aid, does not mean they are obligated to respond. For example, if the Harmony Grove station was in place during the Cocos fire, they most likely would not have provided mutual aid to the Valiano project area because they would have to have resources to protect their fire protection district that was under threat.</p>	CC-32 Section 4.1 of the FPP studied the number of apparatus and staff available to serve the Project, and determined that there would be enough resources to support mutual aid calls to the Project.
CC-33	<p>In addition, Eden Valley residents have to pay an annual fee to Cal Fire as we are part of their service area, yet I was unable to find any attempts to reach out to Cal Fire in our public documents request or in the DEIR. Again, the Fire Protection Plan and the DEIR need to be pulled back and new studies need to be performed by all service areas that will be responsible for the Valiano project area. This is especially necessary given the number of waivers pertaining to fire safety that are being granted by San Marcos Fire. Additionally, those waivers should be based on mutual agreement by all resources expected to provide mutual aid given the dependency on them in this DEIR and FPP.</p>	CC-33 The Proposed Project is in a Local Responsibility Area with the SMFD as the fire authority with jurisdiction and responsibility for emergency services for the bulk of the Project. The SMFD has mutual aid and automatic aid agreements with local and surrounding fire departments to assist with providing emergency services for the area. Also see Response BJ-7.
CC-34	<p>9. Given the fact that this projects FPP relies heavily on both the Escondido Fire Department and the proposed station in Harmony Grove Village for mutual aid to meet county standards, consideration should be given to redrawing the areas of responsibility for fire service. As a former fire fighter, I see that Escondido and Elfin Forrest Fire will be the primary responders 90% or more of the time.</p>	CC-34 The Escondido Fire Department has been involved in reviewing and commenting on the Project and understands that the Project would remain within the SMFPD. The Escondido Fire Department never requested that the Project be added to their fire district. The Project would pay its fair share to the Harmony Grove Fire Station to the satisfaction of the serving fire department [fill in CSA 107 or RSF once it's finally resolved].
CC-35	<p>10. Each lot owner would be individually responsible for the fuel modification maintenance on property lots, including all measures included in the FPP. Property owners would be members of a legally constituted HOA which would support the maintenance of common areas (including roadsides) in perpetuity. Please refer to Appendix L for specific requirements for the ongoing fuel modification maintenance.</p> <p>Project Design Features for Homes with Reduced Defensible Space</p> <p>The following Project Design Features would be included for each dwelling within the Project site that provides more than a 100-foot defensible space, but less than 150-foot defensible space required by the SMFD.</p> <ul style="list-style-type: none"> The following lots fall below the 150-foot defensible space requirement: 1, 3, 4, 119-123, 127, 135, 149, 150, 158, 162, 163, 170, 171, 258, 268 and 289 and shall be called out on a separate plan sheet in plan submittal. The plan sheet for these dwelling units shall list the following requirements shown below. 	CC-35 The FPP concludes that enhanced ignition-resistant measures on the structure, the area between the structure and the property boundary, and the limited use and construction of fire deflector walls for areas with less than 150-foot FMZ's at key locations, would mitigate the fire hazard at those locations within the Project. The SMFD reviewed and approved the FPP, after specifically reviewing each of the listed lots. Some of the lots include fewer than 150 feet of defensible space. The entire proposed development is in a very high to moderate Fuel Hazard Severity Zone or within a wildland urban interface area. There are structures which are along the periphery of Coronado Hills and other open space areas. The FPP documents that the FMZ along these perimeter areas meet the standard fuel modification distances or shall have required enhanced mitigation measures (e.g., fire deflector walls, dual pane tempered glass for all windows facing perimeter fuels, exterior water sprinklers for structures facing fuels, etc.).

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<p>CC-35 cont.</p>		<p>Did San Marcos Fire sign off on these lots since their defensible space is less than the requirement? If so, is this considered another fire waiver for the project? Have the other mutual aid fire departments signed off as well?</p> <p>Are any of these lots on the periphery of the project adjoining the Coronado Hills, adjoining any of the open spaces outlined in the DEIR, or other fire prone areas? If so, this appears to be a major issue as the limited defensible space may be adjoining fire prone areas which could accelerate the spread of fire causing loss of life and property.</p>
<p>CC-36</p>		<p>11. The Project could be inconsistent with the FPP if there is no service agreement between the Applicant, CSA/HGF authority, and SMFD to facilitate service. Therefore, prior to occupancy of any structure that does not meet the five minute travel time according to Figure 7 of the approved FPP, either the Harmony Grove Fire Station must be in operation and providing service, or alternate mitigation measures must be provided to the satisfaction of the County Fire Authority and the PDS Director. The fire station construction is expected to be funded by mid-2016 and operational by 2017. A two-acre lot has been transferred to the County for the new fire station and a Community Facilities District (CFD) has been established as the funding mechanism. Impacts are less than significant with completion of the service agreement and construction and operation of the fire station.</p> <p>The above requirement should be met prior to the start of grading for the project. Fire ignitions during the grading process are common. Two recent large fires were started during grading operations: the 2014 Bernardo fire was started by a backhoe and the 2013 Harmony Grove fire was started by heavy grading equipment working on Harmony Grove Village.</p> <p>Given the estimated 7.5 minute response time by San Marcos Fire, any fire started at the base of the Coronado Hills, where there will be heavy grading and blasting operations for the Valiano project, will see extremely fast rates of spread as the fire will run uphill. By the time San Marcos fire could be onsite the fire could easily be threatening homes in Eden Valley and the Coronado Hills. Thus it is imperative that all fire protection measures, noted as required for occupancy, must be in place prior to the start of grading for the project to ensure the safety of the existing area residents.</p>
<p>CC-37</p>		<p>12. Pg 2.9-20 "Further, the Project would specify maintenance requirements to provide fire safety."</p> <p>What are these maintenance requirements and who will be responsible for performing them? This is not noted in the Fire Protection Plan or DEIR documents.</p>
<p>CC-38</p>		<p>13. "The FPP concluded that any wind or topography driven wildfire burning under a northeast (Santa Ana) wind pattern creates a very high wildland fire hazard, especially for wildland fires starting off-site north and northeast of the Proposed Project site."</p> <p>According to this statement the fire dangers are seen as a wildfire burning through the cities of San Marcos or Escondido as they are located to the north and northeast of the project site. This</p>

<p>CC-36</p>		<p>The temporary Harmony Grove Fire Station is now in place and staffed with full-time paid firefighters; therefore, fire service would be available to the Project site prior to the start of grading.</p>
<p>CC-37</p>		<p>Section 4.5.3 of the FPP addressed this comment regarding maintenance requirements. Section 4.5.3.7 states that the HOA would be responsible for the maintenance requirements.</p>
<p>CC-38</p>		<p>The FPP addressed different worst-case scenarios, including south to southwest moderate to strong winds and the potential fire danger. Also see Response AZ-14.</p>

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<p>CC-38 cont.</p>	<p>clearly indicates that the study was for the San Marcos area as this statement would be correct for the city of San Marcos.</p> <p>I believe these scenarios to be an unlikely scenario here in Eden Valley and have never occurred in the 13 years I have been a resident. The three times I have had to evacuate my home in Eden Valley were all due to fires that started to the west, south, and southeast of Eden Valley that were being driven by winds primarily out of the west.</p>	
<p>CC-39</p>	<p>14. Page 29.20-21 of PSD2013-SP-13-001-DEIR-Chap2.9-Hazards.pdf concludes that the wild land fire hazards would be less than significant. I do not see any study or consideration for a fire that starts west of the project with winds blowing from West to East, which is the dominant wind in the area, and is the exact scenario that occurred in the Cocos fire and other major fires in the local area. A study should be conducted about such an occurrence. Given the terrain of the area, embers will be raining down on the development from above, which is what occurred in this area during the Cocos fire. In addition, 90 to 95% of the project area burned in the Cocos fire which I would think would warrant more stringent study.</p>	<p>CC-39 See Response CC-38 regarding fire scenarios studied in the FPP. Also, the FPP states that one of the greatest risks with worst-case fire scenarios is the flying ember that can originate as far as 2 miles. As a result, design features were incorporated into the Project, including fuel modification zones, use of enhanced ignition resistant building materials, and other enhanced fire and building code requirements. See discussion of this subject in Sections 4.5 and 4.5.3.2 of the FPP.</p>
<p>CC-40</p>	<p>15. In the Fire Protection conclusion I do not see any mention of the Sprinter track crossings. It is known that the roads at all of the Sprinter crossings are already impacted by traffic. In addition, it is also known that the NCTD is planning to increase the frequency of Sprinter train trips through the area which will further impact response times. These impacts to response times from San Marcos Fire should be included in this study.</p>	<p>CC-40 See Response I-55 regarding the SPRINTER crossings and calculation of travel time.</p>
<p>CC-41</p>	<p>16. How can the fire protection summary be less than significant when the entire project will be relying on mutual aid agreements for 100% of the project area? In addition, the mutual aid agreement is based on a fire station that has not yet been built or fully funded. It also makes incorrect assumptions that it will become part of Rancho Santa Fe Fire. I also see no mention or study of what type of fire apparatus will be present at the new station, number of personnel expected to be manning the station, or hours of operation of the station. Currently the Elfin Forrest Fire Station is manned by volunteer fire fighters and at times may have as few as 1 to 3 firefighters which can limit their ability to respond to mutual aid calls.</p>	<p>CC-41 The FPP documents that the response with SMFD resources, mutual aid, and auto response resources from surrounding communities and jurisdictions can provide emergency services required for the Proposed Project. In quick order, other resources can be ordered including air, crews, engines resources, etc. from CAL FIRE, the County, and federal agencies. The temporary Harmony Grove Fire Station is now in place and staffed with full-time paid firefighters, and the Elfin Forest Fire Station remains in place.</p>
<p>CC-42</p>	<p>17. The Fire Protection conclusion is also based on a planned implementation of RCIP, which if implemented on time, would be a very new system by the time the project is built. Thus, if RCIP is implemented it may not reach full effective use for a year or two after implementation. It seems that the fire protection conclusion is once again relying on something that is not yet in place and known to function well in this area, further study is needed.</p>	<p>CC-42 Section 4.1 of the FPP acknowledges that RCIP may not be implemented before construction and occupancy. In recent communication with the EFD, RCIP implementation is currently delayed and not yet implemented. The FPP conclusions are not based on the implementation of RCIP.</p>
<p>CC-43</p>	<p>18. When the above considerations are coupled with the various waivers the developer has been given for road widths, reduced FMZ for some lots, the need to attain easements for the FMZ, variations in the vegetation management program, etc... I fail to see how this all equates to a less than significant finding. More study is needed to validate this finding.</p>	<p>CC-43 The FPP includes restrictions on specific building materials and methods suitable for building in high fire hazard severity zones as identified by CAL FIRE (even though the Project is located in a Moderate fire hazard zone within the San Marcos Fire Protection Zone Map). In addition, the FPP identifies a series of other measures such as minimum water supplies, automatic fire extinguishing systems (interior sprinklers for</p>

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CC-43
cont.

all homes and enhances extinguishing systems/sprinklers for identified structures along the Project perimeter) and roadway widths. Overall, the development includes a redundant layering of fire protection features that have been proven to increase ignition resistance of structures and landscapes and result in communities that are less vulnerable to wildfire.

The approved exception request for a short section of Hill Valley Drive would not affect fire safety, as explained in Response E-6. All lots with reduced FMZs would have enhanced fire protection measures. Also, the FPP has been revised to eliminate easements for off-site fuel modifications. More study is not required.

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Public Services:

1. The Proposed Project site is located within the service area of the Escondido Union School District (EUSD) for K-8 education, and the Escondido Union High School District (EUHSD) for grades 9-12. EUSD serves more than 18,000 students in 23 schools. EUHSD serves the major portion of the City of Escondido and portions of the surrounding unincorporated area, and has more than 8,500 students across three high schools and one continuation campus. Additionally, EUSD opened a new high school, Del Lago Academy, in August of 2013. In the EUSD, Rock Springs Elementary School and Del Dios Middle School are the schools that would serve the plan area for the Proposed Project, and are located approximately 2 and 1.5 miles from the Project site, respectively. The nearest high school to the Proposed Project area within the EUHSD (which would serve the Proposed Project) is San Pasqual High School, located approximately five miles from the Project site.

According to Google maps, the Del Lago Academy is 2.7 or 3.2 miles, depending on the roads taken, from the intersection of Mount Whitney Road and Country Club Drive – which is the closest point the proposed project is to the school. It should be noted that Del Lago Academy is a charter school and not all students will be able to automatically attend this school. To reach Del Dios Middle school the distance is 2.1 to 2.8 miles and Rock Springs Elementary is 3.9 miles away. The measurements described above must be as the crow flies and should be adjusted to reflect actual driving and walking distances.

2. The closest station to the Proposed Project site, Fire Station #3, is located at 404 Woodland Parkway in San Marcos, approximately 1.5 miles from the Project site. The station is fully staffed 24 hours per day by five personnel. Equipment includes one paramedic assessment engine company, one paramedic ambulance, and one cross-staffed type III Wildland Engine (City of San Marcos 2013). In 2011, the SMFD responded to 7,136 emergency calls (or an average of approximately 20 total daily calls to the four stations), 70 percent of which were

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medical emergencies. The department, on average, arrived on scene for medical and rescue emergencies 4 minutes 47 seconds after receiving notification from dispatch (SMFD 2011).

According to Google maps the fire station is actually 2.8 miles away from the closest primary access point to the project. The above paragraph makes it sound closer than it actually is and it should be corrected. Assuming that the estimated 7.5 minute response time noted in the FPP and DEIR was calculated on the erroneous 1.5 mile distance to SMF station #3, it should be

CC-44 Response

CC-45 Response

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CC-45
cont.

recalculated using the proper distance. According to documents in the DEIR this calculation is made on an average speed of 35MPH. Thus at the new distance the response time is 8 minutes. This response time does not appear to take into account that there is no way to reach the project site without crossing the Sprinter train tracks. Should a responding engine encounter a train at an intersection, the response would be further delayed an additional 3 to 4 minutes.

These distances and San Marcos Fire response times all need to be re-evaluated.

In addition, the later paragraph states that the closest Escondido fire station is 3.1 miles away, when it is in fact 2 miles away (from the intersection of Kuana Loa and Country Club Drive) according to Google maps and they do not have any railroad crossing. This means that Escodido fire will be able to provide more adequate response times than are noted in the FPP and DEIR.

Again, the redrawing of areas of responsibility needs to be considered given the density of this project, its fire history, and response times for San Marcos Fire to ensure the safety of area residents.

CC-46

3. As described in the Valiano Specific Plan and noted in the Project Facility Availability Forms, police protection services for the Proposed Project would be provided through the San Diego County Sheriff's Department, under contract with the City of San Marcos. Specifically, the Project would be served by the existing Sheriff's San Marcos Station located at 182 Santar Place (approximately 1.5 miles northwest of the Project area). This station serves a population of more than 111,000 residents located in the station's service area of over 100 square miles (San Diego County Sheriff's Department 2013a). The Sheriff's San Marcos Station provides law enforcement services to the City of San Marcos as well as the unincorporated communities surrounding the station including parts of Escondido, Harmony Grove, Elfin Forest, Lake San Marcos, Mountain Meadows and San Pasqual Valley.

According to Google Maps the Sheriffs station is actually 2.8 miles from the nearest primary entrance to the project, not 1.5 miles as described above. Every distance I have checked in the DEIR appears to be off my one or miles according to Google maps. Each and every distance noted in the DEIR needs to be confirmed.

CC-47

4. Average travel times for the San Marcos Station of the San Diego County Sheriff's Department to unincorporated areas of the County (such as the area of the Proposed Project) from January 1, 2012 through December 31, 2012 were: 0.7 minutes for Priority 1 calls (note: only one Priority 1 call to unincorporated County areas occurred in this time period, and the responding officer was already on scene before the call was received), 19.2 minutes for Priority 2 calls, 24.8 minutes for Priority 3 calls and 51.7 minutes for Priority 4 calls. This includes specific areas both more urban and more rural than the Project site.

Since the nearest Sherriffs station is approximately the same distance away as the nearest San Marcos fire station, how will the Sherriff provide a faster response time than fire? I suspect that they will have the same, if not longer, response times and believe further study is needed. In addition, studies show that with more population density comes additional crime and fire risk. I see in the report that it will take the Sherriff's department just under 20 minutes to respond to

CC-46 Using Google Maps, distances better described in driving distance have been revised in the Final EIR.

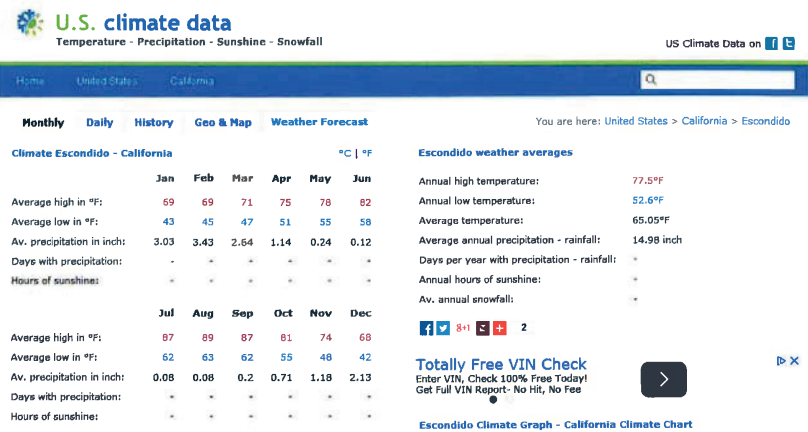
CC-47 The quoted EIR section lists average travel times based upon available records and does not state that the listed times would be the exact travel times in the future. It is possible that the Sheriff response would not be faster than the fire response. Service demand would be likely to increase with implementation of the Proposed Project, but it is anticipated that expanded police protection services would be funded, as necessary, from increased property taxes and other revenues to the County resulting from the Proposed Project. The response times from the Priority 1 call are not irrelevant; the circumstances under which that call took place were disclosed and it would be possible for an officer to be on scene or near scene for a future call.

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CC-47 cont.	any call – the note about response times on the priority 1 call are irrelevant per statements made in the report showing that the officer was already on-site of the call.
	Grading
CC-48	1. The proposed blast areas seem to be very close and down slope of existing homes. In particular the Neighborhood 3 blast area appears to be right up to a neighboring property line. What studies have been performed to ensure that these blasts do not disrupt existing properties above them?
CC-49	2. The grading plan shows extensive grading activities very near or adjacent to existing Eden Valley homes. I do not see how Integral will be able to keep dust and airborne particulate from entering our homes and coating our properties in dust. Yes, they state that they will be watering the project throughout grading operations, but we have already witnessed how little this does in controlling dust with the development of Harmony Grove Village. Additional dust mitigation measures should be studied to ensure existing home owners living adjacent to or near the project site are not affected.
CC-50	3. The proposed project will require an extensive amount of grading to occur, yet states that the project follows the natural contours of the existing land forms. If this statement were true, less grading would be required. I see an extensive use of retaining walls, steep grades, and cut and fill operations in this grading plan and think that the project plan should be re-evaluated to require less extensive grading and use of retaining walls.
	Air Quality
	PSD2013-SP-13-001-DEIR-Chap2.2-Air-Quality.pdf
CC-51	1. "The annual average temperature in the Project area is approximately 55 degrees Fahrenheit (°F) during the winter and approximately 74°F during the summer. Total precipitation in the Project area averages approximately 16.2 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer (Western Regional Climate Center 2012). "
	The above statement appears to be grossly inaccurate for Eden Valley. The valley is typically 10 degrees warmer than Escondido and San Marcos in the summer and 10 degrees cooler than those areas on average in the winter. As this is a valley it tends to trap warm air in the summer and cold air settles in during the winter. The rainfall averages are also grossly inaccurate; the US Climate Data shows it as being 10.6" for Escondido. According to US Climate Data the temperatures and average rainfall numbers are:

CC-48	See Response K-149a regarding the requirement for a blasting plan, which would ensure that blasting does not disrupt surrounding properties.
CC-49	As stated in Table 1.4, the Project includes Project Design Features to control for dust and airborne particles during construction. Property owners have the right to file a complaint if they are being affected by dust and airborne particles.
CC-50	The Project has been designed to follow natural contours, to minimize grading, and to balance soils on site. The amount of grading represents the minimal amount to achieve the desired amount of units and open space. A reduced grading alternative was considered for the Project (see Subchapter 4.4 of the EIR) by eliminating the cul-de-sacs within each neighborhood. However, due to the reduced grading and smaller lot sizes, all of the Project objectives would not be achieved as no horses would be kept within the development and the variety of lot sizes of the Proposed Project would not be achieved. Therefore, to achieve all of the Project objectives, the amount of grading proposed would be necessary.
CC-51	The comment provides two different sources that show fairly similar data to the EIR; the comment claims the rainfall total is 10.6 inches for Escondido, while the EIR and the two provided sources show 16.2, 14.98, and 15.2 inches of rainfall annually. Similarly, the EIR's average high temperature in winter (55 degrees) and summer (74 degrees) closely matches that of Escondido.org's (56 degrees in December and 76 degrees in August). In addition, the meteorological information provided in Subchapter 2.2 is for informational purposes to provide the reader with a background on the setting of the Project area. Temperature is not a variable used in the modeling of daily emissions of criteria pollutants, and any variation from the weather information presented in the EIR to site-specific data would not affect significance conclusions.



According to Escondido.org the weather is:

Weather

Escondido generally has warmer summers and cooler winters than the coast due to city's location.

Temperatures vary from an average of 56° in December to an average of 76° in August, with annual average rainfall of 15.2 inches and 263 sunny days per year. Escondido's climate is mild enough to allow cultivation of avocados, grapes, and oranges.

**Average Temperatures & Precipitation**

Information provided by the [Western Regional Climate Center](#).
For additional information, see [Comparative Data for Western States](#).

▼ **Period of Record: 1979 - 2010**

Month	Average Max. Temp. (F)	Average Min. Temp (F)	Average Total Precipitation
January	68.8°	43.0°	3.15"
February	69.2°	44.4°	3.54"
March	70.4°	47.1°	2.74"
April	74.6°	50.3°	1.14"
May	76.8°	54.6°	0.25"
June	82.2°	58.1°	0.13"
July	87.4°	62.0°	0.08"
August	88.7°	63.3°	0.08"
September	86.6°	61.2°	0.21"
October	80.2°	55.1°	0.63"
November	73.5°	46.5°	1.26"
December	69.1°	41.7°	1.60"
Annual	77.3°	52.3°	14.81"

► **Period of Record: 1900 - 1979**

The weather statements for the area need to be re-evaluated.

COMMENTS

RESPONSES

CC-52 In conclusion, Integral Communities has done little to integrate their project into the existing communities of Eden Valley and Harmony Grove. They are simply going for the highest density possible without considering the safety of the residents who will occupy their project or the safety of those in the surrounding communities. They have also completely disregarded the visual impacts that this project will have on the local area. In my review of the DEIR, there appears to be a large amount of inaccurate and misleading data presented and I feel that the entire DEIR needs to be re-studied. I encourage the County of San Diego Planning & Development Services department to deny this EIR and request that Integral Communities take a more serious review of the impacts that their project will have. In addition, I feel that Integral Communities should be encouraged to work more closely with the communities surrounding the proposed area should they decide to move ahead with a new, less dense, plan.

CC-53

CC-54

Regards,
Bill Osborn
2952 Milpas Drive
Eden Valley, CA 92029

CC-52 See Responses G-6 regarding the proposed density, and AD-5 and U-2a regarding the rural and semi-rural elements of the Project design. See above responses (CC-24 through CC-43) regarding fire safety.

CC-53 Visual issues have been objectively considered. The County Guidelines for Determining Significance and Report Format and Content requirements provide analytical tools to evaluate visual changes associated with a proposed project. Potential visual impacts on the surrounding area form the focus of the detailed Project VIA (Appendix B of the Final EIR), and Section 2.1 of the EIR, which were completed consistent with County requirements. These potential effects are explored in detail, with quantifications provided for grading, proposed homes, and acreages affected. Modified slopes, fire/retaining walls, community/privacy walls and sound barriers are described by location, length and height. Each of these issues is evaluated for potential visual effect, and Project design elements are applied or mitigation measures are proposed to attenuate potentially adverse effects.

CC-54 The County disagrees that the EIR contains inaccurate or misleading data. The EIR represents a comprehensive review of Project impacts and mitigation where such impacts would be potentially significant. See Response BH-2 regarding community input.