COMMENTS RESPONSES

Ehsan, Beth

From: nancyef2010@gmail.com on behalf of Nancy Reed <nancy@elfinforest.net>

Sent: Sunday, June 14, 2015 9:02 PM

To: Ehsan, Beth

Subject: Viliano DEIR comments

June 14, 2015

Beth Ehsan

County of San Diego

Planning and Development Services

Via: Beth.Ehsan@sdcounty.ca.gov

Re: Valiano Draft Environmental Impact Report

Dear Ms. Ehsan,

CH-1

CH-3

CH-4

Thank you for the opportunity to comment on the DEIR for the Valiano General Plan Amendment, Specific Plan and Fire Protection Plan. This SPA is slated for rural, equestrian Eden Valley and next to Harmony Grove, Elfin Forest and Del Dios. All of these communities are rural, equestrian neighborhoods with large estate sized lots accommodating large animal keeping, farming and groves.

The applicant's current zoning alternative is not appropriate as all of the alternative houses are exceedingly large (5 bedrooms). As the surrounding, existing neighborhood consists of mostly 3 bedroom, 2 bathroom homes, this alternative must be revised to more mirror the existing neighborhood.

The Fire Protection Plan is totally inadequate on a multitude of issues. The FPP does not take into account the added population from the Harmony Grove Village. The FPP also does not address the traffic bottleneck at Country Club and Auto Parkway/Nordal Roads which will make evacuation of not only passenger vehicles impossible, it fails to take into account the multitude of horse trailers also attempting to evacuate. In addition the applicant has asked for a road width variance on Hill Valley from the San Marcos Fire Department. The requested width will NOT allow for two large vehicles (think fire truck and horse trailer) to pass.

As a resident of Elfin Forest, a rural equestrian community, I have had to evacuate horses on several occasions. Last May, during the Cocos fire, it was impossible to evacuate west bound on San Elijo Road with horse trailers. As the wind shifted the fire in the opposite direction, myself, my neighbors and our families were not trapped. But we were only saved by the wind shift as evacuations were at a standstill due to the poor planning of the roads in a fire prone area. The applicant's FPP is worse than what is in San Elijo and if approved will lead to death due to the inability to evacuate. It is not if we will have another fire; it is when we will have another fire.

CH-1 Introductory comment noted.

- CH-2 If the commenter is referring to the General Plan Density Alternative when stating the current zoning alternative, the amount of bedrooms were not stated and two to three bedroom houses could be possible. Regardless, five bedrooms would be reasonable based upon economic feasibility. In today's market for houses, two to three bedroom houses would be unlikely to be built on the lot sizes in the General Plan Density Alternative.
- CH-3 The Project would improve private roads to meet the County's Private Road Standards, with the exception noted in Response E-6. See Topical Response: Fire/Evacuations regarding evacuation including animals. See Response K-196 regarding Project impacts in combination with other projects.
- CH-4 See Topical Response: Fire/Evacuation.

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	COMMENTS	
CH-5	The County has identified Harmony Grove, Elfin Forest (Elfin Forest Recreational reserve), Del Dios and the surrounding environs as part of the Multi Species Mitigation Plan due to the vast amounts of existing native chaparral. Eden Valley is a part of these environs. This native "elfin forest" supports more endangered species than in any other place in the nation. The County has spent billions of our tax dollars to purchase land to preserve as a part of the Multi Species Mitigation Plan. It is crazy to allow the urban/suburban development proposed by this project in the middle of the Multi Species Mitigation Plan area. It not only defeats the purpose of the Multi Species Mitigation Plan; but puts people in the middle of a massive fire zone from all the protected chaparral.	CH-
СН-6	After the many massive fires in this area over the last 15 years (Harmony Grove Fire, Paint Mountain Fire, Witch Creek Fire (that burned into the Elfin Forest Reserve), Cocos Fire just to name a few), it is beyond reason to put this high density development in Eden Valley – it is just NOT SAFE.	CH-
СН-7	The DEIR states that this SPA is "smart growth." This is categorically untrue! Eden Valley is rural – it does NOT have sidewalks, bus service, employment centers, grocery stores or any other amenity that is associated with "smart growth." This SPA is urban/suburban sprawl and is incompatible with the newly implemented — General Plan, the Community Plan and the County's Strategic Plan.	CH-
СН-8	The traffic generated by this plan puts the roads at a level of service F. This can NOT be mitigated away except by lowering the density to the current General Plan designation.	CH
CH-9	Of note, some of the traffic surveys were done on holidays and need to be redone and recalculated.	
	Thank you for your time in addressing the above referenced shortcomings of the DEIR for the Valiano SPA. I look forward to your response.	
	Nancy Reed	
	19902 Elfin Forest Lane	
	Escondido, CA 92029	
	nancy@elfinforest.net	
		CH

- While the Project site is within the draft NCMSCP planning area, it is almost entirely outside of the PAMA. PAMA lands are the areas intended to be future preserve lands of the MSCP. As such, the Project site is not considered a priority area for conservation under the draft NCMSCP and Project implementation does not conflict with the draft NCMSCP.
- CH-6 See Topical Response: Fire/Evacuations regarding evacuations.
- CH-7 See Responses D-1, D-4a and I-15 regarding proximity to designated smart growth areas.
- Table 9-2 of the TIA (Appendix H of the Final EIR) shows LOS F operations in the Existing Plus Project Plus Cumulative condition. However, mitigation measures are recommended along Country Club Drive and at the Country Club Drive/Auto Park Way intersection to mitigate those impacts to less than significant. With the improvements to the Country Club Drive/ Auto Park Way intersection, LOS C operations are forecasted, as shown in Table 13-1 of the EIR Traffic Study. In addition, Country Club Drive would be widened to provide a center turn lane providing for an additional 5,000 ADT of capacity resulting in LOS C operations, thus effectively mitigating the Project's impacts along this segment as shown in Table 13-1 of the EIR Traffic Study. On December 9, 2015, the Escondido City Council voted to approve the proposed mitigation to this impacted segment. The current General Plan designation on the site would result in the same significant near-term traffic impacts on Country Club Drive, which as described above the Proposed Project mitigation would also reduce to less than significant.

CH-9 No traffic counts were collected on holidays.