
COMMENTS

RESPONSES

Comments Regarding:

Draft Environmental Impact Report for the Valiano Specific Plan
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

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Comments Regarding
Valiano Project Public Review Draft Environmental Impact Report,
Subchapter 2.8 Transportation/Traffic

Elfin Forest/Harmony Grove Road was Erroneously Omitted from the Traffic Impact Analysis, Valiano, and the TIA Should be Re-Drafted and Re-Circulated to Account for the Omission and Allow Public Comment on the Corrected Analysis

Although the DEIR states that the Traffic Impact Analysis(TIA), Valiano “was prepared in conformance with the County Report Requirements for Format and Content for Transportation and Traffic” it was not prepared in conformance with the County’s criteria because the traffic impact on Elfin Forest/Harmony Grove Road was underestimated and thereby excluded from the study area. The TIA must be redrafted to include a thorough analysis of the cumulative impacts and mitigation indicated related to this road and connecting roads.

Referenced in Section 2.8 Transportation/Traffic and appearing in its entirety in Appendix H, the analysis states, “Based on the County’s criteria, ‘the scope of the full direct and cumulative traffic assessment shall include those roads and intersections that will receive 25 directional peak hour trips.’” The analysis estimates total peak hour trips at 304 AM and 376 PM and states, “Trip distribution percentages were calculated using a Select Zone Assignment (SZA) based on the SANDAG traffic model. The Project-generated traffic was distributed and assigned to the street system based on the results of the SZA and also based on the Project access points, characteristics of the roadway system, and the location of residential and employment opportunities in the surrounding area.” No further justification is given as to these subjective assumptions. Based on these criteria, models and assumptions, the report projects 6% of peak hour traffic will impact Elfin Forest/Harmony Grove Road as shown in Figures 7-1a and b. The report does not give the numbers, but at 6%, they project 18 AM and 23 PM peak hour trips, just below the threshold of 25 directional peak hour trips that would mandate a traffic impact assessment of Elfin Forest/Harmony Grove Road.

Because the subjective assumptions -- area road characteristics, residential and employment opportunities -- are not described in any detail, there is no way to assess their validity. (I’m no expert, but, why is “residential opportunities” in there??? Would Valiano drivers be traveling to/from their recently acquired “residential opportunity” to another “residential opportunity”? realtors, perhaps? – or maybe the document is a boiler plate and the author forgot to take it out.) However, even without the opportunity to analyze these assumptions, the projection that only 18 of 304 drivers during the morning peak hours and 23 of 376 during the evening peak hours will use Elfin Forest/Harmony Grove Road is not credible because it is based on a fallacy. In Figures 7-1a and b, the report forecasts 30% of traffic will be to the west of the project: 20% on 78, 4% on Barham (on a side note, evidently no one ever turns on Twin Oaks Valley Road at Barham – really?), 6% on Elfin Forest/Harmony Grove Road. Also, 4% for Areas 1 & 2, and 7% for Area 3 is forecast to use Del Dios Highway. Even accepting that only 34% to 37% of the traffic will be to the west -- the location of a large share of higher paying jobs, quality shopping and

CT-1a This comment indicates that the Project TIA underestimated and erroneously omitted Elfin Forest/Harmony Grove Road based on the 25 directional peak hour trips standard. The traffic impact on Elfin Forest/Harmony Grove Road was not underestimated, but conservatively overestimated, as explained in Responses K-163 and K-165.

CT-1b As explained in Response K-165, a SANDAG Select Zone Assignment (SZA) was used to distribute Project trips throughout the vicinity. The computerized origin/destination traffic model utilizes several factors in determining the travel patterns of traffic throughout any area. The synergy between land use types is accounted for; roadway capacity, speeds, regional versus local roadways, and transit opportunities are included in the computerized model among other key factors. This method for distributing trips is less subjective and therefore required by a number of local lead agencies as the primary method for forecasting future travel patterns. The traffic impact on Elfin Forest/Harmony Grove Road was not underestimated by using this method (refer to Responses K-163 and K-165). In addition, the Project includes several improvements to Country Club Drive to remove flow restrictions (i.e. northbound left-turn pockets) and improvements to the Auto Park Way / Country Club Drive intersection. The EIR demonstrates that this mitigation reduces

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attractions -- the distribution of flow is not credible. Leaving the Del Dios traffic aside because it is an isolated route and the most direct route to the southwest, there are only two primary routes west from the project towards Encinitas and Carlsbad: (1) via Route 78/Barham-San Marcos Blvd. and (2) via Elfin Forest/Harmony Grove Road, then San Elijo Road to Rancho Santa Fe Road and points beyond. These two primary routes have comparable mileages to almost any destination in those areas. The report allocates 80% of this flow to route (1) and 20% to route (2). This allocation is an unrealistic fallacy because while the mileage to most western destinations is comparable between the two primary route options, the peak hour delays are much greater for the 78/Barham route, especially during afternoon hours. A much larger share of drivers than modelled in the analysis, perhaps half, will be thus induced to take route (2) using Elfin Forest/Harmony Grove Road instead of 78/Barham.

Take for example the choice that would face a driver leaving Valiano to go to work at a company in one of the many industrial parks near Palomar Airport. They could choose to turn left onto LOS F rated Country Club Drive, sit through two D rated signals, followed by two C rated signals to get to the west bound 78 and join bumper to bumper traffic until exiting at San Marcos Blvd on their way to Palomar Airport Road. Or the driver could choose to travel Barham to get to San Marcos Blvd. and experience several D/E/F lights...knowing that taking either way back home will mean joining one of the most notorious traffic jams in the country. OR the driver could choose to turn right on Country Club Drive, avoiding 63% to 74% of the traffic according to the report, go through one stop sign and two minor street stops followed by a right turn at the Harmony Grove Road signal, traveling unimpeded on scenic Elfin Forest/Harmony Grove Road through the town of San Elijo Hills, then left onto San Elijo Road to Melrose which intersects Palomar Airport Road. The Elfin Forest/Harmony Grove route is not only faster and less aggravating, it's a lot prettier. Which would you choose?

To assume that 80% of peak hour drivers traveling to and from the west of the project will choose the slow, aggravating, homely way, and only 20% will choose the faster, pretty way is preposterous. A more likely scenario is at least a 50/50 split which would yield a 15% traffic share for Elfin Forest/Harmony Grove Road and 56 PM peak directional hour trips. Please note that the reduction in the number of dwelling units since the TIA was done is meaningless because while the number of units was reduced by 2.06%, from 388 to 380, the aggregate number of ADTs was only reduced by an irrelevant 0.16%, from 3776 to 3770, by my calculations. The reason for the variance is that the elimination of 8 properties caused 37 to be upgraded to estate residential with lot sizes of 10,000 SF or more. Based on this realistic analysis, at more than twice the County traffic assessment study area inclusion threshold of 25 directional peak hour trips, the Traffic Impact Analysis erroneously excluded Elfin Forest/Harmony Grove Road and must be redrafted to include this significant western thoroughfare and recirculated to allow for public review and comment on the materially modified document.

Cumulative Impacts of Valiano and Harmony Grove Village on Elfin Forest/Harmony Grove Road will be Significant and Will Require Mitigation

The assessment of traffic on Elfin Forest Road generated by the cumulative effects of the Valiano and Harmony Grove Village developments is critically important, because the impacts will affect the cities of San Marcos, Carlsbad and Encinitas as well as residents along the route in Harmony Grove, Elfin Forest

CT-1b cont. the potential impacts of Project traffic on Country Club Drive to less than significant.

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 are more likely to use I-15 to reach their destination. Project trip distribution is discussed in Section 7.2, Project Distribution and Assignment, of the TIA.

Traffic destined for Palomar Airport Road is part of the six percent forecasted to use Harmony Grove Road/Elfin Forest Road to the west.

It should also be noted as further evidence that the six percent is accurate, per Table A in Response K-165, which shows existing volumes on the major roadways leaving the Project area. As can be seen in Table A, the volumes on Harmony Grove Road are much lower than on the other roadways and indicate that the vast majority of area traffic does not use Harmony Grove Road west of Country Club Drive.

CT-1c See Response CT-1b for why the trip distribution is correct. The number of trips generated by the Project was calculated accurately per County of San Diego Traffic Report Requirements. Furthermore, per County of San Diego Traffic Report Requirements, locations receiving 25 directional peak hour trips are to be included in the traffic analysis. Since the Project adds fewer than 25 trips to Harmony Grove Road/Elfin Forest Road west of Country Club Drive, any analysis further to the west is not warranted.

CT-2a Based on the trip distribution using the SANDAG Traffic Model, the Project would add fewer than 25 peak hour trips to Elfin Forest Road and the Elfin Forest Road / San Elijo Road intersection. Therefore, neither analysis of these locations nor fair share mitigation payment by the Project is warranted. It should be noted that the Elfin Forest Road / San Elijo Road intersection is within the City of San Marcos jurisdiction. The City did not comment on the analysis of this intersection and did not request a fair share payment.

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CT-2a and San Elijo Hills. The city of San Marcos may be entitled to additional fair share mitigation payments, particularly because of the added impact on the Elfin Forest Road/San Elijo Road intersection, and the cities of Encinitas and Carlsbad may also be entitled to fair share payments.

For residents of unincorporated communities along the road in Harmony Grove and Elfin Forest, the impacts of added traffic include the typical impacts of noise, vibration and pollution, but most particularly, and especially important, safety. Elfin Forest/Harmony Grove Road is a scenic, windy two lane road with no shoulder in many sections and several blind corners shared by many different types of users. It attracts sports car drivers and motorcyclists because it can be exhilarating for them to drive, and with no enforcement by the CHP they run little risk of being stopped for speeding or reckless driving. The road also attracts cyclists because of its beauty and is one of the most popular rides in the county with thousands of cyclists touring the road, particularly on the weekends. This combined with visitors parked on the road near the Elfin Forest Recreational Reserve walking to and from their cars; hikers, equestrians and mountain bikers crossing the road as they follow the extensive trail system through the hills of Elfin Forest and Harmony Grove; local traffic entering and exiting the road at intersections and driveways that are in many cases blind or hard to see; as well as commuters and others using the road, and it is easy to see that the chance of injury and fatality will only increase with the traffic added by the Valiano and Harmony Grove Village developments.

CT-2b My wife and I can personally attest to the danger. We live right on Elfin Forest Road, and with a hill top view of the road from our backyard we frequently witness dangerous behavior by motorists. Drivers often significantly exceed the speed limit, 70+ miles per hour, especially in front of our house which is on one of the few straightaways. We regularly see speeders pass cars, too, even though there is a dip in the road which can conceal on-coming traffic. We have lived here about three years, and in just that short time there have been three cars run off the road and crash into trees or power poles within sight; one of them on our property. Also nearby, we could hear the terrible crash early one November morning in 2013 when a medical research professional commuting from San Elijo Hills crossed the center line and ran head on into a pickup and died. He left behind his wife and three little girls. There have been other fatalities on the road. Years ago, there was a fatal crash right at our southern driveway. Recently, a motorcyclist carrying too much speed careened into a rock near deadman’s corner at the intersection of Elfin Forest and Harmony Grove Roads. My wife had a close call there, too; if she had not been careful to hug the inside shoulder as she went around the corner an on-coming truck which had crossed the line would have hit her. She had another close call when a speeder passing a car almost hit her as she crossed the road in front of our house to walk the dogs in the Sage Hill nature preserve. I have not had such close-calls, but I commute to work on the road and I am regularly tailgated by speeders; from time to time, they pass me. There are lots of stories like this; according to the Elfin Forest Harmony Grove Fire Department Chief fifteen to twenty accidents occur on the road every year.

CT-3a Alternatives and Mitigation Suggestions
The traffic related impacts on Elfin Forest/Harmony Grove Road of the Valiano project, in addition to Harmony Grove Village and other developments planned in the area, must be studied in a redrafted and

CT-2b The Project does not contribute a significant amount of traffic on the roadway and there is no nexus to require the Project to improve the safety of Elfin Forest Road.

CT-3a The EIR standards indicate that the Project does not contribute a significant amount of traffic on Elfin Forest/Harmony Grove Road, as further discussed in Responses K-163, K-165, and CT-1a through CT-2b. A complete cumulative analysis was included in the TIA (Appendix H of the Final EIR) including Harmony Grove Village, the Proposed Project, and 40 other projects. Contrary to the commenter’s assertion, the EIR adequately evaluates the potential environmental impacts that would result from traffic, consistent with CEQA and the County CEQA Guidelines, as seen in Subchapter 2.8 of the EIR. No new impacts, mitigation, or recirculation is warranted.

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- CT-3a cont. recirculated TIA, and significant impacts must be mitigated to protect the safety and health of all road users. Alternatives and mitigation suggestions are summarized below.
- CT-3b - Mitigation of traffic congestion by construction of an additional access road to the project via La Moree to encourage more traffic to take the 78/Barham route should be evaluated.
 - CT-3c - Law enforcement patrols would help.
 - CT-3d - Traffic calming and noise abatement measures should be explored and implemented. Perhaps several stop signs along the road would slow down traffic and discourage excess trips and channel traffic toward major arteries such as Twin Oaks Valley Road.
 - CT-3e - There is one speed monitoring sign in Elfin Forest and others would help.
 - CT-3f - Horse crosswalk signs at intersections of the road and trails would at least help make drivers aware of the trail and the potential for crossing equestrians and others.
 - CT-3g - Fair share payments to cover sound reduction expenses should be made to local residents impacted by the additional road noise and vibration.
 - CT-3h - Of course, the most effective mitigation would be improvement of peak traffic flow on Route 78, in which case perhaps 80% of the traffic to the west of the project and Harmony Grove Village would use the route in real life as modeled in the Valiano Traffic Impact Analysis. Until such time, a much larger share of travelers will choose the expedient and scenic, but risky, Elfin Forest/Harmony Grove Road.

The Department of Planning and Land Use Can and Should Require Redraft and Recirculation of the TIA to Include an Analysis of Emergency Evacuation Traffic Impacts on Project and Area Access Roads

According to the County Report Requirements for Format and Content for Transportation and Traffic, "...an assessment of the need and adequacy of emergency access is not typically evaluated in a traffic impact study..." Perhaps for this reason no mention is made whatsoever in the TIA as to special situation traffic impacts during an emergency evacuation, even though such impacts in the fire prone area of the project are likely to occur and will be significant, in fact potentially life threatening, when they do occur. However, the County requirements also state, "An evaluation of separate access alternatives may be required by DPLU to fully evaluate potential access routes to the proposed project." In light of the extreme fire risk in the Eden Valley/Harmony Grove/Elfin Forest area, the residents of which must share the same few local roads out to safety in the event of a wildfire, a redraft and recirculation of the TIA to include an evaluation of cumulative area development project impacts on evacuation access routes, as DPLU is authorized to require under this policy, is certainly in the best interest of the regional public and should be called for by DPLU leadership. To be a realistic and valuable model, any redrafted and recirculated TIA so undertaken must include the cumulative total impact generated by Valiano, Harmony Grove Village, boarder and current area resident horse truck and trailer traffic on evacuation route roads. A professional evaluation of this important issue may identify mitigation measures yet unrealized, that could yield a safer environment for Valiano and all area residents in the event of emergency evacuation.

- CT-3b See Response I-63 for why an additional access route to La Moree Road is not feasible.
- CT-3c Providing law enforcement patrols is not the responsibility of the Proposed Project. In addition, the Project would pay applicable development impact fees for public services. County staff coordinated with the San Diego County Sheriff in Project review to ensure police protection services are available to serve the Project.
- CT-3d Mitigation measures to improve traffic flow are proposed along Country Club Drive. Given the low turning movement volumes from private drives and dead-end roadways along the road (including the Project access roads), stop-sign warrants would not be met to control north/south through moving traffic along Country Club Drive. The County does not utilize stop signs as traffic calming measures since, if unwarranted, they are often ignored and/or can result in rear end collisions. The Project has included traffic control measures on Country Club Drive (stop signs) at the minor street access roads (Eden Valley, Mt. Whitney, Future Access 5A North and South) and to provide left-turn pockets providing a refuge for turning movements from the steady flow of northbound oriented traffic. No off-site improvements are included on Elfin Forest Road. There is no significant impact on Elfin Forest Road, and therefore there is no nexus to propose improvements such as additional stop signs.
- CT-3e Roadway safety impacts were calculated to be less than significant as a result of the Project. Therefore, there is not a nexus for the Project to provide speed monitoring signs on County roadways. If you would like to request additional speed limit signs based, you may contact the Department of Public Works at any time by calling (877) 684-8000 toll free or by completing the online Road Service Request Form at <http://www.sandiegocounty.gov/content/sdc/dpw/roads/onlineroadservicerequestform.html>. Public Works would evaluate the situation and determine whether additional signage is warranted.
- CT-3f See Response CO-5 and Subsection 1.2.1.2 in Chapter 1.0 of the EIR for proposed access and circulation. Pedestrian and equestrian crossings at unsignalized intersections are legal at all intersections, whether marked or unmarked. Road users (drivers, pedestrians and equestrian riders) should exercise caution when approaching or crossing unmarked intersections. On-site roads would have lower posted speeds than Country Club Drive and present fewer hazards for pedestrian and equestrian crossings.
- CT-3g The Project would not result in significant noise impacts to off-site residences, and therefore mitigation is not required. See Response K 139 regarding the assessment of direct off-site exterior noise impacts.

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- CT-3h As shown in the traffic analysis and EIR, Project impacts were calculated to be less than significant on SR-78 with the addition of Project traffic. Therefore, Project mitigation on SR-78 is not warranted. A Caltrans project to install HOV lanes on SR-78 is planned for the future which will improve SR-78 traffic flow.
- CT-4 See Topical Response: Fire/Evacuations regarding fire evacuation. When the Report Format and Content Requirements are read in their entirety, it is clear that the FPP is the primary document that analyzes access requirements for fire safety. The Project was evaluated and determined to meet access requirements of the Fire Code in an FPP, prepared by a PDS- approved fire consultant, was reviewed and approved by the San Marcos Fire Department and San Diego County Fire Authority; thus no further analysis is required within the TIA.

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Comments Regarding
Valiano Project Public Review Draft Environmental Impact Report,
Subchapter 2.9 Hazards and Hazardous Materials

Hazardous Impacts of Horses and Market Animals Planned to be Allowed in Neighborhoods Were Erroneously Omitted from the Draft Environmental Impact Report, and the DEIR and Related Studies Should be Redrafted and Recirculated to Account for Omission of These Significant Impacts and Allow for Public Review and Comment on the Materially Modified Documents

While the authors of the Valiano DEIR acknowledged in Subchapter 2.9.2.8, Vectors, that horsekeeping causes significant vector related impacts based on County Guidelines for Determining Significance – Vectors, and addressed mitigation of these impacts for horses to be kept at the stables, they failed to acknowledge or address that horses to be kept in neighborhoods three and five will have the same environmental impacts. Add to this the failure of the DEIR authors to acknowledge or address the environmental impacts of other “market” animals that will be allowed to be kept in all Valiano neighborhoods, and it is clear that the authors of the DEIR are responsible for a substantial cumulative omission of a significant impact that has the potential to create serious environmental hazards for Valiano residents and the surrounding community in multiple ways.

Including and in addition to vectors, three of the primary hazardous impacts of animal keeping in the neighborhoods are:

1. Valiano residents evacuating with their horses and other animals will add greatly to the impedance of all area evacuees, a significant impact that will put thousands of lives at risk throughout the area.

Eden Valley is a small amphitheater with only two narrow roads out. If the applicant is permitted to crowd Eden Valley with many hundreds of new residents and their hundreds of cars, market animals, at least 54 horses or more, and an equivalent number of horse trucks/trailers, the community will be a set scene of disaster the next time AlertSanDiego yells fire.

Furthermore, evacuating populations of people and animals from Valiano combined with the thousands of people and animals from Harmony Grove Village will increase the current potential traffic on the roads several fold during an emergency and will congest all of the few narrow escape routes out of the area to the point where everyone from Eden Valley, Harmony Grove, Elfin Forest and, indeed, thousands from San Elijo Hills, under the worst case, will be at risk of being trapped and forced to harbor in place.

Remember, this happened in San Elijo Hills during the Cocos fire and if the wind had not changed direction many of the people trapped on San Elijo Road could have lost their lives. If it were to happen again and a fast moving conflagration like any one of twelve major fires in these hills since 1980 reached evacuees trapped in a traffic jam on sections of Elfin Forest/Harmony Grove Road where the topography is very steep, these people would be doomed because there is no way out. As long as Santa Anas blow during hot, dry summers in Escondido, a tragedy of this nature is an all too real possibility. Again, evacuating people were trapped on a nearby road just last year during the Cocos fire. The same fire

CT-5 Mitigation measure M-HZ-4 requires the preparation of a manure management and fly/vector control plan according to established DEH standards prior to Final Map approval. In addition, the Valiano HOA would have agreements in place with private homeowners with horses or other market animals to control for vector-related impacts.

CT-6 See Topical Response: Fire/Evacuations regarding fire evacuation and evacuation with horses.

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CT-6
cont.

burned over 90% of the Valiano land and destroyed 36 homes as it swept through Eden Valley and nearby Coronado Hills and Harmony Grove.

Sadly, the applicant and author of the DEIR failed to even acknowledge much less offer any mitigating solutions to this most serious and potentially deadly hazardous impact of the Valiano project -- an unconscionable omission and clearly one that authorities must compel the applicant to mitigate.

In DEIR Section 3.1.4 Land Use and Planning, under Hazards and Hazardous Materials, *Emergency Response and Evacuation Plans*, the DEIR states, "To address hazards associated with emergency response and evacuation plans, the Proposed Project must apply policies from the Mobility and Safety Elements" and goes on to enumerate the relevant policies, M-1.2, M-3.3, M-4.3 and S-1.3. For some reason, M-4.4, Accommodate Emergency Vehicles, is omitted from the list. Because of this omission and the omission of the impact of horse and other animal keeping in the neighborhoods, the DEIR is enabled to assert that, "By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values."

In fact, it is reasonable to assert, the Proposed Project is in conflict with three of the applicable policies. Policy M-1.2, Interconnected Roadways, states that the Proposed Project shall "...provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies." Policy M-4.4, Accommodate Emergency Vehicles, requires that the Proposed Project "design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents."

CT-7

The Project fails to comply with both of these policies because emergency services are likely to be impeded rather than supported during a fire evacuation by horse truck/trailers entering and leaving Valiano. Entering truck/trailers would be mostly boarders coming to rescue their horses at the stables or neighborhood properties where boarding will be allowed under the new Equine Ordinance. Furthermore, the evacuating Valiano residents with their animals combined with evacuating Harmony Grove Village residents with their animals will cumulatively contribute over and above the impact of current residents to impede access/egress routes on all of the escape routes out of the area that must be shared by all area residents from Eden Valley, Harmony Grove, Elfin Forest and, possibly, San Elijo Hills. Because of this emergency evacuation traffic impedence impact which will increase response times in a fire evacuation emergency, the Proposed Project is also in violation of the safety policy, S-1.3, Risk Reduction Programs, which requires that a proposed project "...reduce the time for responding to these hazards."

These are most certainly dangerous hazard impacts that would affect the health and safety of thousands. Yet they were omitted by the DEIR authors. They must be addressed, and, because of the extremely dangerous and wide spread nature of the risk, if the applicant cannot or will not adequately mitigate these impacts, the only ethical outcome is project termination for the protection of area residents.

Mitigation

CT-7

See Topical Response: Fire/Evacuations regarding evacuations. The General Plan policies listed under Emergency Response and Evacuation Plans in section 3.1.4 (M-1.2, M-3.3, M-4.3, and S-1.3) are the policies listed as applicable to Emergency Response and Evacuation Plans in Chapter 7 of the General Plan Update EIR. Chapter 7 of the GPU EIR was used to identify those General Plan policies that were adopted for the protection of environmental resources or values. The Project is consistent with policies M-1.2 and M-3.3 because it includes multiple ingress/egress road connections to disperse traffic and improve efficiency: Mount Whitney Road, Eden Valley Lane, two direct connections to Country Club Drive, and emergency access to Hill Valley Drive and Mount Whitney Road to ensure emergency services during fire and other emergencies. 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. Country Club Drive is a public road that connects to other public roads both to the north and south. Rather than giving guidance to individual projects, Policy S-1.3 gives direction to the County to support efforts and programs that reduce risk; the Project would not preclude implementation of this policy by the County. The Project would conserve the rural character of Country Club Drive, consistent with Policy M-4.3, by incorporating only minimal improvements at the Project's access points. All other Project access roads are private roads, which would also retain their rural character. The Project would reduce road widths and rolled curbs to maintain rural character. Finally, the Project is consistent with Policy M-4.4 because access roads would comply with public or private road standards as applicable and meet all conditions required by the San Marcos Fire Department to allow necessary access for fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents. Because the proposed road connections provide for evacuation consistent with applicable policies and codes to the satisfaction of fire authorities, a road connection to La Moree Road is not required; in addition, see Response I-63 for why a connection to La Moree Road is deemed infeasible.

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CT-7 cont. One mitigation to consider would be the construction of a wide enough road to La Moree to enable all Valiano residents to evacuate while leaving plenty of room for emergency vehicles and others to access the site. It would also take some of the pressure off other evacuation routes in the area.

CT-8 2. The issue of proper storage of hay and feed for animals in the neighborhoods is the source of two types of significant impact because improper storage could result in a fire or vector issue.

Wet hay can spontaneously combust, a consequence that is a significant environmental impact addressed by the applicant for the stables in neighborhood five, but ignored by the applicant for the animals in the neighborhoods. The issue was also omitted from the Fire Protection Plan for the neighborhoods and the stables. If a hay fire occurs in a rural area, the barn might burn down; in the suburbs, the neighborhood could burn down – especially if the houses are only ten feet apart. Hay and other animal feed is also a vector issue which was not addressed in the DEIR for the neighborhoods. Most assuredly these are significant environmental impacts that must be addressed in the Hazards and Hazardous Materials section of the DEIR as well as in the FPP.

Some alternatives and mitigations could include:

CT-9a - Construct dry, fire safe feed storage structures at neighborhood properties similar to those described in the DEIR for the stables. Separated them from backyard animal enclosures to ensure horses and other animals do not have access to feed.

CT-9b - Construct fire safe combined use animal enclosures with hay lofts and lifting apparatus to prevent injury to delivery people or residents.

CT-9c - Operate a HOA managed community hay and feed co-op to centrally store hay in a safe structure, and distribute hay on a bi-weekly basis using trucks with mechanical lifting technology to limit hay storage in neighborhoods. The co-op would benefit from trailer load hay pricing passed on to co-op members which could include the wider Eden Valley/Harmony Grove community.

CT-9d - HOA engaged pest control company to provide monthly insect and rodent prevention services to residents including spraying, rat traps, and fly traps. HOA control over vector mitigation will help ensure vector mitigation is properly conducted, as opposed to ceding control to individual residents who may fail to comply causing an enforcement, fire risk and vector multiplication issues for neighbors.

CT-10 3. The issue of proper storage and disposal of animal waste from the neighborhoods is the source of several potentially significant hazardous impacts.

A typical horse will generate about 500 pounds per week of manure and soiled bedding, the impact of which is mitigated in the DEIR for the stables but not for neighborhood horses. Combined with similar waste from market animals in the neighborhoods, the cumulative volume and weight of the material will cause vector, sanitation, odor, pollution, and injury hazards that must be addressed. In rural areas where the properties are large, private owners can dispose of the material by employing a waste collection company with dumpster service, or by collecting, composting and spreading the material as mulch or fertilizer, often using a tractor. In a sub-division like Valiano, none of these options are

CT-8 See Response AD-21 regarding storage of hay.

CT-9a Residents who choose to keep horses would be required to store feed and hay properly, as stated in Response AD-21.

CT-9b The detailed design of hay storage and animal enclosures would be left to those residents who choose to keep horses, as long as all accessory buildings and enclosures meet the relevant setbacks and regulations of the Specific Plan, Building Code and Zoning Ordinance. There is no impact identified under CEQA that requires detailed design up-front as a mitigation measure.

CT-9c The Project does not have a significant impact requiring operation of a co-op by the HOA as mitigation, although the Specific Plan does not preclude establishment of a co-op based on sufficient interest from future residents.

CT-9d Mitigation measure M-HZ-4 requires the preparation of a manure management and fly/vector control plan according to established DEH standards prior to Final Map approval.

CT-10 Mitigation measure M-HZ-4 requires the preparation of a manure management and fly/vector control plan according to established DEH standards prior to Final Map approval. In addition, the Valiano HOA would enforce proper maintenance and disposal of manure and hay as described in Response AD-21. The HOA would have the discretion to implement some of the recommendations proposed in the comment; however, these measures would not be addressing an unmitigated significant environmental impact. Thank you for your recommendations.

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CT-10
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practical for an individual homeowner. Also, the enforcement issue must be addressed for individual homeowners because failure by them to clean and muck after their animals will adversely subject their neighbors to associated hazards and nuisances. As a result, effective and reliable mitigation may require central control of these activities to ensure compliance with County health standards.

Some alternatives and mitigations could include:

- Community waste to energy co-op with centralized processing facility operated by HOA to perform energy conversion used to offsets energy expenses for common area energy use. Sale of composted by-product to farmers or use as mulch on common areas or grove.
- HOA employed labor with necessary equipment including trucks with appropriate mechanical lifting technology to prevent injury and safely remove waste products daily from neighborhoods. The waste would be stored at a safely constructed common collection area to contain odors, prevent ground water contamination and limit fly breeding for later removal by trash company or use in waste to energy community compost co-op.
- HOA engaged pest control company to provide monthly insect and rodent prevention services to residents including spraying, rat traps, and fly traps.
- Operate a centralized HOA managed fly predator breeding facility and distribute predators around neighborhoods to create a natural limit to fly populations.
- Develop a multi-level animal designator scheme similar to Harmony Grove that accommodates a lower and safer number of properties designated for horses and/or market keeping animals.

Other impacts associated with keeping horses and market animals in the neighborhood should also be addressed and mitigated

With 54 designated horse properties, parking of trailers and trucks sufficient to evacuate these animals will cause significant environmental impact. A typical horse trailer is too tall for a standard garage and will need to be parked on the street, in the driveway or somewhere else nearby.

Alternatives:

- Increase setbacks and pave side yards to accommodate trailer parking for designated horse properties.
- Create centralized trailer parking lot at or near stables with enough parking places for all fifty-four neighborhood designated horse properties plus enough parking places to accommodate boarders with horses at the stables.
- Modify home designs to enable extra tall garages deep enough to park a horse trailer.
- Add community horse truck and trailer parking lots for both neighborhoods three and five.
- Reduce the number of designated horse properties to limit the necessary number of horse trucks and trailers to reduce road congestion particularly during an emergency evacuation.

CT-11

Horses will need to leave the backyards from time to time for exercise or to be transported, and this may present a safety hazard in neighborhoods. Because there is not enough room in most of the

CT-12

CT-11

As stated in your comment, homeowners would be able to park trailers and trucks on the street, in their driveway, or somewhere else nearby; however, the equestrian lots provide adequate space for horse trailer parking as shown on Figure 1-9. As many residents of the area currently do, homeowners would also be able to bring in an outside trailer or truck for an evacuation. See Topical Response: Fire/Evacuations for additional information on animal evacuations. The mitigations and alternatives offered in the comment do not apply.

CT-12

The Valiano HOA would have agreements in place with private homeowners with horses for proper handling of their animals. Failure to abide by those agreements would result in revocation of the homeowner's ability to have large animals on site. In addition, there would be exercise opportunities for horses on the proposed multi-use trails and the warm-up ring in the public equestrian area.

COMMENTS

RESPONSES

CT-12
cont.

backyards to exercise a horse, and horses require regular exercise, horses will need to be taken out of the yards for exercise. This presents a safety hazard because the horses will be in an unenclosed area and could get loose or do damage to persons or property if the handler lost control of the animal. A particularly dangerous situation could be posed by loading horses into trailers under these circumstances. Just like racehorses loading in the starting gate, some go in easy, some get terrified or unruly and get away, or hurt someone or themselves. A loose, scared half ton animal is a dangerous safety hazard. For this reason, handling of horses in the neighborhoods represents a significant safety impact that needs to be addressed.

Thank you for your time and consideration.