The comment is introductory and expresses concern about the adequacy of the DEIR’s fire and traffic analysis and omission of analysis for use of alternative septic. See Topical Responses: Fire/Evacuation and Sewer, and responses to specific comments, below.

The commenter is correct that the DEIR evaluates six alternatives including a Septic Option Alternative. The DEIR considered a range of reasonable alternatives that feasibly accomplish most of the basic objectives of the Project and avoid or substantially lessen one or more significant effects. Alternative wastewater treatment systems (Alternative Septic - AS) referred to in this comment were not permitted directly through the County and were not accepted according to County design standards and principles at the time the DEIR was prepared so there was no opportunity to evaluate it as an alternative. The Septic Option Alternative analyzed in Subsection 4.7 of the DEIR was based on the assumption that “…each house could have five bedrooms and each lot could be at least 5 acres in size to accommodate septic systems.” Pursuant to the Final County Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems which was issued after the Notice of Preparation was issued for the Project, this assumption has been changed to allow minimum 2-acre lots (with the number of potential bedrooms per house to remain unchanged). Accordingly, the revised Septic Alternative
**COMMENTS**

**J-2a cont.** Alternative, General Plan Density Alternative, Reduced Grading Alternative, Biologically Enhanced Alternative, Off-site Sewer Options Alternative, and Septic Option Alternative. In addition to these last two alternatives, the DEIR should have evaluated a project alternative incorporating alternative onsite Wastewater Treatment Systems (OWTS).

Alternative OWTS includes advanced treatment in addition to the primary treatment that occurs in the septic tank. Alternative OWTS should be evaluated as an alternative because it would allow the Valiano project to be consistent with the septic policy of the San Diego County Community Plan (Elfin Forest - Harmony Grove) and achieve a more robust unit count than the Septic Option Alternative. The DEIR concludes the Septic Option Alternative would "fail to meet all of the Proposed Project objectives." The DEIR does not explicitly state which of the objectives would not be met, but 35 single-family residences on five-acre lots — the development limit with conventional septic — would presumably fail to provide a variety of lot sizes, increased density, or a range of housing types.

Alternative OWTS, however, would allow the Proposed Project to utilize septic, thus conforming with the Community Plan, and achieve the project's stated objectives, including accommodation of a variety of lot sizes, increased density, and a range of housing types. Because alternative OWTS would meet most of the basic objectives of the Proposed Project and could avoid or lessen significant impacts associated with the project, the DEIR should be revised to include evaluation of an Alternative OWTS Alternative.

**J-2b** The DEIR Should Be Recirculated to Include an Evaluation of Alternative OWTS

Because the Valiano DEIR failed to include an evaluation of an alternative OWTS alternative, the DEIR should be revised and recirculated. Per CEQA Guidelines § 15088.5(a), if new significant information is added to an EIR after public notice but before certification, it must be recirculated. Significant new information includes: "[a] feasible project alternative [...] considerably different from others previously analyzed [that] would clearly lessen the significant environmental impacts of the project [...]" CEQA Guidelines § 15088.5(a)(6). An alternative OWTS alternative would present a feasible project alternative, different from both an on-site wastewater treatment facility or conventional septic, that would lessen the significant environmental impacts of the project.

**J-2c** The screenshot under J-2c is not clear, but it appears to be a continuation of the discussion on the DEIR.

**J-2d** See Topical Response: Septic and Responses I-29.

**J-2e** There are numerous Project objectives articulated in the EIR and accompanying Specific Plan including, but not limited to, the provision of needed housing in proximity to infrastructure, places of work and transportation. The preservation of resources and a balanced, contemporary approach to planning a new community require the careful balance of many considerations.

**J-3a** See Topical Response: Septic and Response I-29. The Septic Option Alternative has been expanded to include consideration of both conventional and alternative on-site wastewater treatment system (OWTS) designs. Therefore, an additional alternative is not required as both type of septic systems are analyzed in the EIR. Based on existing site conditions, the conventional septic would allow 58 units and the alternative sewer would allow 66 units. Impacts are very similar between the conventional and alternative systems. Therefore, recirculation of the EIR is not required. Additionally, if the objective is to achieve the desired general plan densities, please be advised that Subchapter 4.3 the DEIR studied that alternative.

**J-3b** The impact conclusions would not be less than significant as stated by the commenter, but most issue areas would also require mitigation as with the Proposed Project (aesthetics, noise, paleontological, and biological). Based on the updated Septic Alternative contained in Subchapter 4.7 of the EIR, the alternative septic alternative would have impacts similar but not much higher than the conventional septic alternative (66 homes versus 58 homes), which slightly reduces impacts in every impact area. The commenter notes that the alternative septic would allow a more robust lot yield, but this would be likely to have impacts similar to the existing General Plan density alternative that reduces impacts in aesthetics, air quality, noise, paleontological resources, transportation/traffic, and geology. In either case, an alternative septic alternative would not add significant new information to the EIR.
The DEIR Inadequately Analyzes Transportation/Traffic Impacts

The Proposed Project is situated in a "bow" shape valley, prone to fire, including the recent Coco's fire. Despite the probability of a fire occurring that will prompt an emergency evacuation – where all the residents and equestrian businesses will be seeking to evacuate simultaneously – the DEIR and transportation/traffic study failed to analyze the scenario where residents of Eden Valley, Elfin Forest, and Harmony Grove are all attempting to evacuate their homes. This is an especially problematic omission because the DEIR concludes "a significant impact to the Country Club Drive roadway segment between Auto Park Way and Hill Valley Drive in the City of Escondido under Existing Plus Project conditions would occur (Impact TR-1a)." This conclusion fails to consider the natural follow-up question whether this roadway segment would be able to safely accommodate the traffic spike in the event of an evacuation scenario. The DEIR should be revised to include a modeled projection of roadway traffic in the event of an evacuation and to analyze whether an unacceptable risk to public safety would occur during an emergency.

A second transportation/traffic issue that was inadequately analyzed is Hill Valley Drive. The DEIR explains Hill Valley would need to be improved to a graded width of 28 feet and an improved (paved) width of 24 feet. "These improvements would allow Hill Valley Drive to meet the private road standards." Yet, these improvements are not proposed; instead, the Proposed Project discusses a design exception: "a design exception has been made by the County PDS for one section of this road [. . .] that would only be improved to 20 feet wide due to easement access issues." As with the traffic issues on Country Club Drive between Auto Park Way and Hill Valley Drive, this design exception is not analyzed in the context of an emergency evacuation. Presumably, the County maintains design standards for a reason—why an exception to these design standards is appropriate here should be explained and justified; or, the design exception disallowed.

The DEIR Inadequately Analyzes Fire Safety

Fire safety and transportation/traffic are closely related for the Proposed Project, but the nexus between the two is inadequately analyzed in the DEIR. As discussed above, the DEIR fails to address transportation/traffic impacts from an evacuation scenario and fails to adequately justify a design exception to the private road standards for Hill Valley Drive. In turn, the Fire Protection Plan fails to address the risks of inadequate roadways during an evacuation scenario.

See response J-3a

See Topical Response: Fire/Evacuations. Regarding Impact TR-1a specifically, while the TIA (Appendix H of the EIR) does conclude a significant impact on Country Club Drive, improvements to mitigate several impacts would be completed by the Project. Preparing a LOS operational analysis of Country Club Drive for a full evacuation of the area is not the County’s standard of practice and would not be useful due to the number of variables that cannot be included in modeling. Note that while the impact on Country Club Drive north of the Project would be both direct and cumulative, the Project includes improvements that would reduce impacts to before Project traffic levels.

The commenter asks if Country Club Drive north of the Project would be able to safely accommodate the traffic spike in an evacuation. Since circulation of the DEIR, the City of Escondido has required a center turn lane in the city segment of Country Club Drive (see Response E-12). In an emergency it would also be available for safety responders to use or for the Sheriff to use in directing traffic. The accommodation has been made to mitigate the Project’s contribution to traffic impacts. The Project change does not result in impacts that require recirculation under CEQA because they do not result in important new information. See Response J-4a.

The comment requests a model of traffic during evacuation. Preparing a LOS-based operational analysis of Country Club Drive for a full evacuation of the area is not the County’s standard of practice and would not be useful due to the number of variables that cannot be accurately included in modeling.

The Project would improve private roads to meet the County’s Private Road Standards, with an exception for a portion of Hill Valley Drive. See Response E-6. The Project would also improve the intersection at Hill Valley Drive and Country Club Drive. Section 12.0 of the TIA contains an analysis of Hill Valley Drive and the Hill Valley Drive intersection at Country Club Drive. For the short distance where Hill Valley Drive is 20 feet in width, vehicles, including fire apparatus, would be able to pass and the width would not prevent fire apparatus from gaining access to a potential fire within the Project area or prevent those evacuating from leaving the area. SMFD and County PDS support the design exception to allow emergency access on this road.
The comment questions how the Hill Valley Drive exception would operate during an emergency evacuation. As mentioned, the road would be gated at the Project because it would be used for emergency access. For the short distance where Hill Valley Drive is 20 feet in width vehicles, including fire apparatus and horse trailers, would be able to pass. It is a straight segment of road with available sight distance and this would not prevent fire apparatus from gaining accessing to a potential fire within the Project area or for those evacuating to leave the area. SMFD and County PDS support the road design exception because the added traffic is only for emergency access. Hill Valley Drive would be improved to private road standards (24 feet paved width) if the right of way or easement becomes available for use or purchase; it would then be used as a day-to-day access and not only for emergency purposes. Improvements for Hill Valley Drive as an alternative access road are listed in Subsection 2.8.2.10 of the EIR.

The comment questions the allowance of design exceptions in light of standards. The County has a process for requesting exceptions to Design Standards because not all facilities can fit the standard due to physical or other limitations. As discussed in Response E-6, a design exception was allowed because it was determined that the exception would not adversely affect the safety and flow of traffic in this area due to the following reasons: the Project conforms to all Fire Code access standards without the excepted access; only the Project’s emergency traffic would likely utilize the narrower section due to its location near the gate; and that the SMFD found the reduced improvement and easement width to be acceptable. In addition, Section 12.0 of the TIA contained in Appendix H of the EIR includes an analysis of Hill Valley Drive and the Hill Valley Drive intersection at Country Club Drive.

The nexus between fire safety and transportation/traffic is illustrated in the TIA. The FPP has been revised to document and illustrate the emergency evacuation routes and roadway improvements to be accomplished by the Project. Ingress and egress would be adequate in the event of an emergency.

Previous responses have adequately addressed these comments and there have been appropriate revisions to the FPP. The additions to the FPP are clarifications and do not rise to the level of important new information that would require recirculation of the EIR under CEQA. See responses E-6 and J-4e.
Section 4.1 of the FPP has been revised to include more recent agreements and approvals for meeting the five-minute travel time by the first-in fire apparatus and to include that the temporary Harmony Grove Fire Station became operational in October 2015.

The comment is a summary conclusion statement and Responses J-1 through J-5 address the stated concerns.

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