

COMMENTS

RESPONSES

From: Doug Dill
To: Ehsan, Beth
Cc: Sibbet, David
Subject: Valiano DEIR Comments ? June 11th SDPG meeting
Date: Friday, June 12, 2015 1:26:41 PM

The motion at last night's SDPG meeting to approve submitting the comments below to the Proposed Valiano General Plan Amendment (GPA) Project – SP13-001, GPA13-001, STP13-003, TM5575, REZ13-001, ER13-08-002 Draft Environmental Impact Report (DEIR).
Vote: 9 -YES, 0- No, Abstain: 1 (L. Jones)
Absent SDPG members: B. Liska
Vacant SDPG seats: 4

San Dieguito Planning Group
June 11, 2015 Meeting

Agenda Item 6H –Comments to Proposed Valiano General Plan Amendment (GPA) Project – SP13-001, GPA13-001, STP13-003, TM5575, REZ13-001, ER13-08-002 Draft Environmental Impact Report (DEIR).

San Dieguito Planning Group comments to the Valiano DEIR covers the following key Land Use points:

- Inconsistencies with the Community Plan
- Inconsistencies with the General Plan
- Project Alternatives
- Justification for the GPA

The DEIR does not adequately analyze several important aspects of impacts on the community, as summarized below.

LAND USE – Inconsistent with the Community Plan

The DEIR falls short on analysis to the impacts on community character.

DEIR section 1.6: The Valiano project is inconsistent with the Harmony Grove Community Plan Policy LU-2.2.1.

From the EFHG CP: "Issue LU-2.2. Several agricultural operations are finding that limits to their operations are leading them to consider re-zoning and re-development in the near future. In addition, non-resident land speculators have purchased local undeveloped land in the hopes that higher density will be adopted by the Board of Supervisors through General Plan Amendments. Development of these parcels outside the proposed Harmony Grove Village Boundary (refer to Figure 3) with an urban, clustered, or suburban design threatens the continued existence of the rural residential and equestrian character of Elfin Forest / Harmony Grove.

Goal LU-2.2 Preservation of the lifestyle of the rural resident while accommodating growth.

Policy LU-2.2.1 Ensure that the number of urban residences does not greatly exceed that of the rural

M-1 The comment is introductory in nature and detailed responses are provided below.

M-2a The County's General Plan is a planning document which seeks to implement the County's planning principles and goals across a broad and diverse area. Unincorporated County land encompasses more than 2.3 million acres of diverse environment. This broad area of study cannot encompass each parcel of development and must allow for adjustments to the General Plan to allow properties to conform to the principles and goals of the General Plan as social, economic, and physical conditions within the county change over time. Please see Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis regarding parcel planning history and the General Plan.

The Project is consistent with EFHGCP's intent and goals. Policy LU-1.5.1 specifically allows clustering within the Harmony Grove Community Plan area for the preservation of resources. In addition to Policy LU-1.5.1, Policy LU-1.4 Areas of Change: Development Infill and Intensification refers to infill development of the type the Valiano Specific Plan is proposing. LU-1.4 references the reader to the County of San Diego general plan for guidance on infill development and intensification. The Valiano project's proposed clustered design preserves 31.2 acres of

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M-2a  
cont.

*residences in the greater unincorporated communities of Harmony Grove and Eden Valley.*

Although the project's density falls into the semi-rural category, and the project emphasizes semi-rural elements and themes, the project design features closely clustered, suburban homes with the majority allowing no horse keeping. Because the associated **Issue LU-2.2.1** specifically calls out an *“urban, clustered, or suburban design”* as the types of residence this policy is directed toward, and further specifies that this clustered design *“threatens the continued existence of the rural residential and equestrian character of Elfin Forest / Harmony Grove,”* the project’s contributions to the urban /rural balance should be calculated and any impacts identified and mitigated.

M-2b

The community plan supplements countywide policies and *“further directs the land uses and development desired to achieve the community’s vision.”* (From *“How to Use the Community Plan”*, page 5, EF-HG CP). The vision of the future ideal state of the Harmony Grove community is described in the CP: *“The historic rural habitat is preserved where the Village is surrounded by large-lot rural homes and small, family owned farms and vineyards* that preserve the critical relationships necessary for this environmentally sensitive and balanced green community. *The all-important rural voice is not overwhelmed by the urban voice”* (page 23; italics added for emphasis). The HG CP also clearly defines the Existing Community Character: *“Some of the key elements of the Harmony Grove character and values include one- and two-story single family homes on large (multi-acre) lots; large animal facilities on residential properties; no clustered development; no “cookie-cutter” developments; no walled developments, and no gated communities”* (page 16; italics added for emphasis).

Thus the clear intent of **Policy LU-2.2.1** is to prevent the current Harmony Grove rural residents, identified in this CP as living in large lot equestrian properties, from becoming outnumbered by residents of clustered, small lot, non-equestrian properties. This skewed ratio would create a majority voice for the suburban resident and encourage migration of the original rural equestrian residents out of the community, further eroding the community character and culture. Development according to the current GP yields an urban/rural balance consistent with **Policy LU-2.2.1** (see calculations below). Development according to the Valiano GPA, including counting the project’s horse keeping properties as rural residences, still yields a 3 to 1 urban over rural, altering the residential balance that **Policy LU-2.2.1** was designed to protect. This issue and the possible impacts to community character should be studied in the EIR.

M-2c

Comment for EIR section 3.1.4.2: The Valiano project, by its clustered design, is inconsistent with **Policy LU-2.2.1** (see related comments in EIR section 1.6) and thus conflicts with policies designed to protect the environment. Consistency with **Policy LU-2.2.1** preserves the vision of the Harmony Grove community as described in the CP: *“The historic rural habitat is preserved where the Village is surrounded by large-lot rural homes and small, family owned farms and vineyards that preserve the critical relationships necessary for this environmentally sensitive and balanced green community”* (page 23; italics added for emphasis). The project’s clustered design significantly reduces the number of large lot properties that would provide opportunities for small, family owned farms and vineyards. The Community Plan’s vision is for produce from these small farms to be sold locally in the HG Village center, thus lowering traffic and emissions, contributing to a balanced,

M-2a  
cont.

biological open space as well as 35.4 acres of agricultural land which would be preserved through and agricultural easement, therefore the Valiano Specific Plan area is consistent with the intent and goals of the EFHGCP. Should a General Plan Amendment to Semi-Rural 0.5 be approved the project would be consistent with the principles and goals of the County of San Diego General Plan in relation to infill development as well as maintain the rural designation. Therefore the residences proposed within the Specific Plan area cannot be urban in nature and the rural balance is maintained. Further analysis of impacts to the rural/urban balance is not appropriate at this time. Finally, the comment stated concern over lack of horse-keeping properties. Large/market animals are allowed in two Valiano neighborhoods, 3 and 5. Neighborhood 5 is the only Project neighborhood within subarea plan boundaries. Within Neighborhood 5, 33 (over 50 percent) of the lots would allow horses. See also Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis and Responses G-6, G-7, I-3 and I-7.

M-2b

The commenter identifies that based on the Valiano GPA that there would be a yield of 3 to 1 urban over rural, altering the residential balance of Policy LU-2.2.1. See Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis and Responses G-4, G-6, and I 7.

M-2c

See Responses G-6, K-112, K-113, and K-174e. The proposed 35.4-acre on-site agricultural easement (Response I-69a), as well as the potential for on-site agricultural mitigation/operation on individual lots (Responses K-20 through K-24) would provide potential opportunities for associated produce to be sold locally in the HG Village Center.

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M-2c cont. green community as described in the CP. The impact of an inconsistency with **Policy LU-2.2.1** of the clustered design on this green environmental balance with agricultural resources should be studied.

M-3 As noted in the Valiano FFP, *“as the density of structures and the number of residents in the interface increases, potential ignition sources will multiply and a large wildfire occurrence increases.”* Consistency with **Policy LU-2.2.1** would significantly lower the number of residents and reduce the potential for human-initiated ignition sources. Consistency with **Policy LU-2.2.1** would avoid or reduce most of the significant impacts associated with the project, including unmitigated aesthetics and air quality impacts; and impacts related to biological resources, cultural resources, noise, paleontological resources, transportation/traffic, hazards and hazardous materials, public services (fire protection), geology and soils. The extent of compliance of the project with **CP Policy LU-2.2.1** and the possible impacts to the local environment of non-compliance with this policy should be studied in the EIR.

M-4 The County position states *“The project’s density falls into the semi-rural category, and the design of the project emphasizes semi-rural elements and themes. Thus the project will not cause urban residences to exceed rural residences.”* is not accurate. The phrase *“emphasizing elements and themes”* is a vague description of what constitutes a rural vs. urban lifestyle compared to the Community Plan which specifically foresaw and put policies in place to define the rural community character.

M-5 Policy CM-10.2.1: *“Require all proposed new development to use septic systems with one septic system per dwelling unit”*. Inconsistent as Valiano GPA to utilize a central sewer system to support the high density small lot suburban development.

**F. LAND USE – Inconsistent with the General Plan**

M-6a Excerpts (shown in italics) from the current SD County General Plan:  
 p. 2-3. *We will continue to avoid or minimize developing in areas susceptible to geologic, wildfire, and flooding risks and we will continue to retain and protect the viability of our woodlands, riparian corridors, and important plant and animal habitats, maintaining the health and viability of declining species.*

This is from the GP Guiding Principal 2, and directs projects located in areas susceptible to wildfires, such as this project site, to have minimal development; the Valiano GPA to allow a several hundred percent up zone would be inconsistent.

M-6b p. 2-9 **Guiding Principle 3 Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.** *As the County continues to grow, it is critical that development be located, scaled, and designed to retain and enhance the qualities that distinguish its communities. Development planning must consider uses; parcel sizes; building form, scale, massing, and architecture; landscapes; and site development practices that are comparable to, or transition with, existing development to ensure that new development “fits” with the community.*

M-3 The Project’s FPP (Appendix L of the EIR) provides information on fuel modification and fire protection of the Plan area: *“The Valiano Specific Plan will adopt fuel modification zones in accordance with the FPP to assure proactive and effective fire prevention. Fire resistant landscape design would provide required buffering while striving to maintain the visual and biological integrity of the native/naturalized plant communities.”* The Project’s FPP identifies requirements for fire protection for future development within the Plan area. Those requirements are incorporated by reference into the Valiano Specific Plan.

Although there is not a direct relationship between Policy LU-2.2.1 and the significant impacts identified for aesthetics in the EIR, the County agrees that implementation of fewer homes would be likely to reduce, even if not wholly avoid, significant visual impacts assessed to the Project. The reduction in density would be visually balanced by the potential for less biological open space and potential ridgeline development associated with pushing development into the northern Project parcel, which is not proposed for residential use under the Proposed Project. This is explored in EIR Chapter 4.0, Alternatives, under the General Plan Density Alternative. That alternative is described as resulting in reduced visual impacts; and corresponding preference for that alternative over the Proposed Project for the issue of visual effects, as stated in the EIR on page 4-9.

The potential variation in environmental effects is addressed for each of the topics listed in the comment, with evaluation as to preference relative to the Proposed Project. No additional review is required.

M-4 See Responses G-6, G-7 and I-7. Although the word “rural” appears many times within the EFHGCP, and some understanding of its meaning can be inferred from the context, there is no official definition of “rural” or “urban” within the EFHGCP. In the absence of such a definition at the Community Plan level, the County must use the General Plan definitions of rural, semi-rural, and urban, which are strictly based on density.

M-5 See Responses G-2, G-3, and G-7.

M-6a The Project site is located in a very high to moderate Fuel Hazard Severity Zone. As described in Response K-65, implementation of the Project would reduce fire hazards for the Project site and surrounding areas. Therefore, the Project would be consistent with the quoted passage by decreasing the area’s susceptibility to wildfires.

M-6b The comment concerns community character, and specifically the clustered design which the commenter identifies as inconsistent with Guiding Principle 3. This issue is discussed in Responses I-7 and I-8.

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M-6b  
cont.

The Project is inconsistent with Guiding Principal 3 because with its clustered design and small lots (as small as 5,000 sq ft), it does not scale development to be comparable with existing large lot development to fit with the rural and estate lot surroundings.

**p. 2-11 Guiding Principle 5 Ensure that development accounts for physical constraints and the natural hazards of the land.**

*New development should be located and designed to protect life and property from these and similar hazards. In high risk areas, development should be prohibited or restricted in type and/or density*

M-7

Again, the Project GPA is inconsistent with Guiding Principal 5 because it locates higher density development in a high fire risk area greatly exceeding the density identified and allowed for this area in the current GP.

**p. 2-13 Guiding Principle 8 Preserve agriculture as an integral component of the region’s economy, character, and open space network. Permitted densities in prime agricultural areas should be reduced to sustain sufficient parcel size for viable agricultural activities.**

M-8

The Project is inconsistent with Guiding Principal 8 because it eliminates 118 multi-acre parcel sizes adequate to maintain small family owned farms, specifically encouraged in the EFHG Community Plan, and preserves only 36.5 acres of avocado grove, for a loss of 84% (202.5 farm land acres) at the project site. In addition, small family owned farms are more conducive to variable agricultural activities than are large acreage, monocrop farms such as an avocado grove.

**p. 2-14 Guiding Principle 10 Recognize community and stakeholder interests while striving for consensus.** *The residents of San Diego County’s unincorporated communities and rural areas have chosen to live here largely due to its environmental setting of hillsides, valleys, deserts, and agriculture; low-density rural character; absence of congestion and pollution; friendliness of neighbors; and pace of life that contribute to a high quality of life distinct from the urbanized environment of coastal San Diego and adjoining inland areas. As growth continues, development must be managed to protect these assets.*

M-9

The Project is inconsistent with Guiding Principal 10 because it is inconsistent with the Community Character and Community Vision as detailed in the EFHG Community Plan and as such has not yet reached consensus with the greater community interests. The applicant should continue to work with the community to design a development that preserves community goals while accommodating growth.

**p. 3-6 Community Development model**  
*The Community Development Model directs the highest intensities and greatest mix of uses to Village areas, while directing lower-intensity uses, such as estate-style residential lots and agricultural operations, to Semi-Rural areas. Semi-Rural areas often function as a transition between the Village and Rural Lands categories, providing opportunities for development, but without the intensity and level of public services expected in Villages and with design approaches that blend the development with the natural landscape. Residential development within Semi-Rural areas is not typically served by municipal sewer systems, but is often served by municipal water systems especially where*

M-10

M-7

The comment states that the Project increases density in a high fire risk area. See Response K-65 regarding effects of increased density on fire risk and K-181 regarding the fire hazard level.

M-8

The commenter is concerned with loss of agriculture. See Response I-69a regarding the Project’s agricultural impacts and mitigation, and Response K-24 regarding the infeasibility of on-site mitigation. In addition, as described in Subchapter 2.3 and Appendix D of the EIR, the Project site encompasses approximately 117.4 acres of “active” agricultural use, including 117 acres of avocado orchards and 0.4 acre of apiary use (with portions of these uses impacted by the 2014 wildfire; see Response K-23). Accordingly, the proposed 35.4-acre on-site agricultural easement would result in the loss of approximately 70 percent of the noted on-site agricultural uses, rather than 84 percent as stated in this comment.

M-9

The comment states the Project is inconsistent with community character and has not reached consensus with the community. See Responses G-6, I-7, and I-8 (with specific reference to the EFHGCP allowance of consolidated lots in accordance with LU-1.5.1) regarding the definition of rural and the Project’s rural elements. The developers took input from the community and implemented those comments into the Specific Plan area. Some of the more significant changes from public input include: an increase in equestrian uses and inclusion of an equestrian trail head; reduction in total units; increased open space; removal of walls and gates; and allowance for equestrian properties.

M-10

The comment concerns the Project’s consistency with the community development model and the definition of semi-rural. These issues are discussed in Responses G-6, G-7, I-4, I-7, and I-8. In addition, there are numerous examples of where semi-rural neighborhoods are served by municipal sewer systems, such as Rancho Cielo within the Olivenhain Municipal Water District.

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M-10  
cont.

*water-intensive crops such as avocado and citrus are common.*

The project does not even mention the local CDM nor its own position in this County-approved development pattern, that is, in the semi-rural periphery defined above as “lower-intensity uses, such as estate-style residential lots and agricultural operations”. The clustered design and small lots are by this definition inconsistent with the placement of the project homes in the semi-rural periphery, and its associated cumulative effects on future development should be studied and mitigated. If the applicant feels that having small lots in a clustered design but with rural themes will be a suitable substitute for “estate-style lots” in a semi-rural area they must provide research-based evidence to support this claim.

M-11

LU-2.4 **Relationship of Land Uses to Community Character.** *Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.*

As noted elsewhere, the project is inconsistent with several Community Plan goals and policies and therefore is also inconsistent with General Plan **Policy LU-2.4**. This inconsistency should be noted and mitigated.

**PROJECT ALTERNATIVES:**

The DEIR does not analyze an alternative project on this site that matches the character of the adjoining rural and estate lot neighborhoods. Instead the “environmental superior alternative” is a “reduced grading” version, which eliminates 6 lots and 7 cul-de-sacs lots, whereas both the General Plan and the Septic Only version have markedly fewer impacts. The “septic only” version only includes only 5 BR homes on 5 acres minimum lots, which does not match the surrounding properties that all operate on septic with many different lot sizes and numbers of bedroom.

The revised EIR should evaluate a version more in line with the existing community character, with the following criteria:

- Similar in look and feel to the surrounding rural and estate residential homes in both County and San Marcos that are within the community view shed.
- Mix of 2- to 5- bedrooms
- Range of lot sizes
- Implementing alternative sewer systems as well as conventional septic systems
- Minimal grading and land form modification
- Biological open space contained within a separate lot as opposed to “backyard open space” whose functionality can more easily be compromised.
- 2-acre minimum lots on the portion of the site that has prime soils, to reduce agricultural impacts.
- Incorporating a dedicated agricultural easement over the portion of those lots that remains usable for agriculture, which would be counted as mitigation and potentially eliminate the need to purchase off-site mitigation.

An alternative septic only project with these criteria would likely meet some of the Project

M-12

M-11

This comment states that the Project is inconsistent with applicable Community Plan policies. The County disagrees. See EIR Section 3.1.4 and Responses G-2, G-4, G-6, I-3, I-8, I-35, I-46, I-67, K-96a, and K-124 through K-137 for responses to specific policies. The cited discussions support consistency with General Plan LU-2.4. Please also see Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis.

M-12

The Proposed Project does not have a significant, unmitigable impact to community character, and therefore would not need to analyze an alternative that would mitigate that impact. See Subchapter 4.8 and Table 4.1 regarding the selection of the Reduced Grading Alternative as the environmentally superior alternative. The Septic Option Alternative was originally based on the assumption that “...each house could have five bedrooms and each lot could be at least five acres in size to accommodate septic systems.” Pursuant to the *Final County Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems*, however, this assumption has been changed to allow minimum 2-acre lots (with the number of potential bedrooms per house to remain unchanged). Specifically, the referenced LAMP, which post-dates the Proposed Project NOP, identifies an allowable density of 2 acres per single-family dwelling in areas with an average annual precipitation level of between 15 and 20 inches. As outlined in Subchapters 2.2 and 2.3 of the EIR, the Project site vicinity exhibits an average annual precipitation level of between approximately 15 and 16 inches, with the minimum 2-acre lot size therefore appropriate. Accordingly, the updated Septic Option Alternative analysis is based on 2-acre minimum lots and up to five bedrooms per unit, with a preliminary lot layout provided in Figure 4-7 of the EIR.

While a community character alternative would not be warranted, the General Plan Density Alternative covers many similar aspects to those listed in the comments. As the guiding document, the General Plan has more precedence over the community plans. That alternative



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M-12  
cont.

has an average 2-acre lot size (bedrooms are not specified), would be similar in look and feel to the surrounding areas, and would contain less grading and land form modification than the Proposed Project. A septic system would not be realistic for the General Plan density, as lot sizes would not be large enough per current County guidelines. The Septic Alternative was updated to include an alternate septic system design and it was determined based on site constraints that it have similar density to a standard septic system (see Response I-29). In addition, Rincon MWD would likely not support the use of such alternative septic systems for the Project (Rincon MWD desires to develop the recycled water supply in support of its 2014 UWMP update and is concerned with any type of increased septic use in this groundwater basin). Regarding the agricultural aspects of the alternative, see Responses I-32, I-42 and I-43.

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| M-12 cont. | Objectives, such as providing a range of home sizes.  |
|            | <b>Suggested Alternative Project to be analyzed in recirculated DEIR</b>  |
| M-13a      | A “septic-system” hybrid design with varied home sizes featuring a mix of 2- to 5- bedroom homes with on varying lot sizes. Newly approved advanced treatment septic system units should be used as required to reach GP allowed density.   |
| M-13b      | Streets should be arranged on a grid pattern rather than a network of cul-de-sacs, where possible, extending existing streets so new Valiano neighborhoods can integrate more easily with existing residents on similarly sized larger lots. Smaller lots would be oriented more centrally (away from existing residents) where possible. No sewage treatment facility to be allowed in Valiano neighborhood 5, as per EFHG Community Plan. Any such facility in Eden Valley would have to be surrounded by Valiano project homes in order to shield existing residents from adverse impacts of such a facility, because Eden Valley residents receive no benefit and should have only minimal exposure to the project impacts.                                     |
| M-13c      |   |
| M-13d      |   |
| M-13e      | A majority of project homes should allow horse keeping, like the surrounding community, and a public trail system to connect all homes to the larger regional trails. Equestrian lots should be sized appropriately to accommodate all necessary horse keeping requirements such as feed storage, animal waste storage and horse trailer parking. No additional community amenities are necessary such as landscaping, but if provided, there should be provision to share, on a paid basis, with the existing residents. There should be no community-wide gates or walls, and the portion of the development in Harmony Grove should be associated with the name “Harmony Grove” and the portion in Eden Valley should be associated with the name “Eden Valley”. |
| M-13f      |   |
| M-13g      |   |
| M-13h      | Multilevel homes can be designed to follow the natural grade of the land to the greatest extent possible to reduce the amount of grading or blasting required and thus reduce impacts to the environment and existing neighbors. This would also match some of the designs currently used by the existing homes both in Eden Valley, Harmony Grove and the San Marcos Coronado Hills. Instead of creating large flat “yard” space through extensive grading and blasting, recreational space is provided by large balconies and decks that provide desirable views, are easier to maintain than high water use lawns, and can reduce fire risk by utilizing flame retardant construction materials.   |
|            | <b>Improvements to Existing Roads and Chronic Traffic Congestion</b>  |
| M-14       | As indicated on the DEIR, the private streets of Mt. Whitney Road and Eden Valley Lane are the primary access points into the proposed new 326 home subdivision. Both streets feed on to Country Club Lane, a public road, placing the burden of all Valiano traffic on Country Club Lane. The DEIR should describe an alternative utilizing an additional access point to La Moree Road to the north, thus taking the burden of all Valiano traffic off Country Club Lane.   |
| M-15       | Mt. Whitney Road and Eden Valley Lane do not meet current County Private Road Standards. The DEIR does not describe how the residents along Eden Valley Lane will be mitigated for the impacts to bring the Lane up to current private road standards.  |

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|-------|---|
| M-13a | The comment suggests adding a new septic design as an alternative. As stated in Response M-12, a reasonable range of alternatives was included in the EIR and the Septic Alternative was updated to include an alternative septic system. See Response M-12 for details of why the suggested alternative would not work.  |
| M-13b | The commenter requests an alternative designed on a grid pattern. A grid pattern is more realistic in the flatter valleys, where many of the existing residents are located. The Project site topography is, in general, more varied with moderate slopes. Alternative design therefore would follow the natural contours where possible to minimize grading and landform modification, and not follow a grid pattern.  |
| M-13c | The commenter suggests locating smaller lots more centrally within the Project and not allowing sewage treatment in Neighborhood 5. See Response G-7 for why connecting to sewer is allowed by the EFHGCP. Regarding locating lots more centrally, due to the north to south orientation of the Project parcels and topographical and biological considerations, it would not be feasible to have a central location to put the majority of the lots.   |
| M-13d | The commenter asks for the WTWRF to be surrounded by Project homes to avoid impacting neighboring residents. The WTWRF would not need to be surrounded by Project residences to avoid significant impacts because as proposed, the WTWRF would not cause significant impacts to surrounding residents. See Responses K-17, K-28, and K-142 for discussion of WTWRF impacts.   |
| M-13e | The General Plan Density Alternative is an alternative that would allow horse keeping on all lots. The Proposed Project contains a public trail system that connects to larger regional trails. In the alternatives and the Proposed Project, animal-keeping is allowed on certain Project lots per County zoning requirements.   |
| M-13f | The comment states that no community amenities are necessary in the proposed alternative. See Subchapter 4.0 for discussion of each alternative and community amenities.  |
| M-13g | The Proposed Project and analyzed alternatives do not contain community-wide gates or walls. Walls would exist where appropriate to mitigate for noise impacts or as retaining walls. An emergency access gate would exist on Hill Valley Drive if Hill Valley is used as an emergency access road only. 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 and there would be not gate. Improvements for Hill Valley Drive as an alternative access road are listed in Subsection |

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- M-13g cont. 2.8.2.10 of the EIR. Thank you for your suggestion on the proposed names; however, the name of the Project is not a CEQA issue and the naming of the Project would be at the discretion of the developer.
- M-13h Alternatives analyzed such as the General Plan Density Alternative and Septic Option Alternative contain similar lot design that would follow the natural grade of the land to a greater extent than the Proposed Project.
- M-14 The commenter suggests including an alternative that would add additional Project access to La Moree Road; however, this was determined infeasible as discussed in Response I-63.
- M-15 Mt. Whitney Road and Eden Valley Lane would be improved to County Private Road Standards. No significant impacts would occur to residents along these streets during improvements, and no mitigation would be required.



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M-16

For years, serious chronic traffic congestion has existed to the north of Eden Valley where the northern terminus of Country Club Lane ends at Auto Parkway. The combination of the Citracado Parkway Industrial Park, Mission Road, the Sprinter light rail line, CA 78 Freeway, and the Nordahl Road shopping district, which includes Walmart and COSTCO, has been and continues to be a chronic traffic bottleneck.

The DEIR should recognize this chronic traffic situation and determine whether the added ADTs generated by Valiano can be mitigated or not.

**Addressing the California Drought**

M-17

The DEIR should address the additional water use to be generated by the proposed 326 du Valiano Project. Besides the immediate requirements to reduce water consumption by 25-45% by state and local officials, the drought has brought a new awareness to modify lifestyle over the long-term as it pertains to water consumption, landscaping, agriculture, as well as industrial use of water. The DEIR should describe the mitigation the applicant proposes on the impact of additional water consumption by 326 new residential units.

**JUSTIFICATION FOR GPA:**

M-18

The current San Diego County General Plan, page 1-15, states:  
*The General Plan is intended to be a dynamic document and must be periodically updated to respond to changing community needs. An annual review of the Plan is required to ensure that it remains relevant. Moreover, any of the Plan's mandatory elements may be amended up to four times a year. Any proposed amendment will be reviewed to ensure that the change is in the public interest and would not be detrimental to public health, safety, and welfare.*

This information contained in this DEIR does not identify the "changing community need" that is the first requirement for the GPA. It also does not demonstrate that the change is in the public interest; and does not demonstrate that the project would *not* be detrimental to public health, safety, and welfare.

**Impacts to adjoining cities:**

M-19

The DEIR acknowledges that air quality will be an unmitigable impact, as will noise from construction. In addition to the rural residents of Eden Valley and Harmony Grove, Escondido and San Marcos residents will be affected by the additional traffic, not analyzed in this EIR. The closest San Marcos residents, in Coronado Hills, will see their views of open space impacted by the Valiano development as well as endure the noise and disruption of heavy construction including blasting. On build out, the Valiano small lot subdivision will be inconsistent with the adjacent Coronado Hills estate size lots.

M-20

**The project potential to be detriment to public health, safety and welfare** because of the extraordinary fire safety issues surrounding evacuation in a highly impacted and constrained valley. Recent history with the Coco's fire, as well as 12 other major fires in the area since 1980, was not

M-16

The commenter asks that the EIR analyze chronic traffic congestion at the Country Club Drive/Auto Park Way intersection. A full analysis of the Country Club Drive/Auto Park Way intersection during peak AM and PM commuter periods is included in the TIA (Table 9-1). The Project is calculated to contribute to a significant cumulative impact at this intersection. The mitigation for a cumulative impact is typically the contribution of a fair share dollar amount to a future improvement. However, instead of a fair share contribution, the Applicant has worked with the City and agreed to the following mitigation identified in their letter to the County dated December 22, 2015 (Letter E, Comment 24 through 27): The Project would improve the intersection at Auto Park Way and Country Club Drive traveling west of the intersection with connected sidewalks, an additional left turn pocket on Country Club Drive, adding a right turn pocket (through restriping) on Auto Park Way traveling west onto Country Club Drive, and widening Country Club Drive to provide a paved width of 36 feet consisting of two travel lanes and a 10-foot striped center turn lane starting 220 feet southwest of Auto Park Way for a length of approximately 830 feet. The mitigation reduces the impact to less than significant (LOS C).

M-17

The comment states that the Project will increase water usage and asks how the Project will mitigate for additional water consumption. See Responses C-2, C-8, C-10 and K-99 for comparison of proposed water use to historical water usage. In addition, the Project would conserve water by implementing the following measures: recycled water from the Project WTWRP would be used for all common area irrigation, including private parks, streetscapes and manufactured slopes; the Project would produce enough recycled water to permanently irrigate approximately 36 acres of land, conserving tens of thousands of gallons per day; the Project's outdoor landscaping plan would minimize turf, maximize drought-tolerant plants and natives, and incorporate weather-based irrigation controllers, multi-programmable irrigation clocks, and high efficiency drip irrigation systems; and at the time of final inspection, a manual would be placed in each building that includes, among other things, information about water conservation.

M-18

The commenter questions the justification for the GPA. The change in community need is specific to the San Diego County housing shortage. The shortfall of residential units necessitates residential development, and the location of housing has been prioritized to be in western portions of the County rather than eastern expansion. Inclusion of the Proposed Project development is consistent with this. The EIR evaluated the environmental significance of impacts to the site and provides a recommendation of mitigation to impacts. When implemented, mitigation measures reduce impacts to levels that do not significantly harm public health, safety, and welfare. See Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis.

COMMENTS

RESPONSES

- M-19 The comment lists impacts to adjoining cities. This comment is correct that cumulative operational and construction air quality impacts would be an unmitigable impact. The traffic analysis did consider the distribution of traffic into the cities of Escondido and San Marcos. Impacts and mitigation to City of Escondido roadways and intersections are discussed in Subchapter 2.8; impacts to City of San Marcos roadways and intersections would be less than significant. See Response K-11c regarding views from Coronado Hills.
- M-20 The comment raises fire safety issues with evacuation. See Topical Response: Fire/Evacuations.

COMMENTS

RESPONSES

M-20  
cont.

analyzed in the DEIR. The Coco's fire conflagration demonstrates acute issues with evacuation through Country Club Drive, Kuana Laua and Harmony Grove Road, without accounting for any of the additional 750 du HGV residents.

Respectfully submitted by,  
Douglas Dill  
Vice Chair, Seat 15  
San Dieguito Planning Group



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