



20223 Elfin Forest Road
Elfin Forest, CA 92029

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May 9, 2018

David Pallinger
Chairperson
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Re: Valiano Vineyards Alternative

Dear Mr. Pallinger:

Please consider the Valiano Vineyards alternative to the proposed Valiano project. It would provide over 80% of the same affordable housing as the Proposed Project, with a greater range of housing types, while ensuring public safety in the fire-prone Eden Valley/Harmony Grove area by limiting the scope of the development to prudent general plan densities. Most significant impacts would be eliminated or reduced, and the lower total density would relieve daily traffic congestion promised with the Valiano project, and enable much safer egress in the event of an evacuation. A vineyard and winery would occupy the eastern-facing slopes, or the current orchard use could be continued, preserving steep slope topography while returning a yield on investment and long-term capital appreciation through value-added agriculture.

The Valiano Vineyards alternative meets all of the CEQA requirements for alternatives. It meets every project objective, in most cases better than does the Proposed Project; is composed of portions of alternatives chosen for analysis in the DEIR in part for their feasibility and thus would be similarly feasible; and would substantially lessen the significant effects of the project.

And while the total density is the same as the General Plan Density alternative, the similarity stops there. Whereas the General Plan Density alternative meets perhaps three project objectives, Valiano Vineyards meets all of them, most of them better than the Proposed Project. The General Plan Density alternative offers one type of housing and lot type, while Valiano Vineyards offers more variety than the Proposed Project. No agricultural easement would likely be implemented under the General Plan Density alternative, while the agricultural easement would be expanded under the Valiano Vineyards alternative. Whereas the impacts of the General Plan Density alternative would be *greater* for three of ten environmental issue

types than the Proposed Project, Valiano Vineyards would substantially lessen impacts for *every one* of the ten environmental issue types as per the extensive and detailed analysis presented in the submitted alternative. Because the Valiano Vineyards alternative is substantially dissimilar from any other alternative and offers superior advantages over any other alternative, the San Diego Planning Commission might want to consider whether the terms of CEQA would be better fulfilled by considering the Valiano Vineyards alternative rather than, or in addition to, the General Plan Density alternative.

Valiano Vineyards is completely unique among the alternatives proposed that meet the CEQA requirements for consideration. It is the *only* alternative, including the Proposed Project, that checks all the boxes:

1. meets *every* project objectives, **and**
2. substantially reduces environmental effects including *every* un-mitigatable impact (except the one impact unmitigatable even with no project), **and**
3. is feasible based on the four CEQA mandated evaluation criteria:
 - a. site suitability
 - b. economic viability
 - c. availability of infrastructure
 - d. General Plan consistency

The Proposed Project doesn't meet all of these criteria; neither does the General Plan Density alternative. Moreover, Valiano Vineyards not only meets these criteria, it is superior to the Proposed Project in terms of *all three* of these primary CEQA evaluation criteria:

1. Better project objective attainment, as thoroughly described in the proposal;
2. Substantially reduced environmental effects, also thoroughly described in the proposal;
3. Greater feasibility: Whereas Valiano Vineyards meets every feasibility evaluation requirement, as described in the proposal, the Proposed Project arguably fails to meet two of the four CEQA feasibility evaluation criteria: (1) because area road infrastructure is inadequate to serve the project, rendering an LOS F rating for daily drivers, and creating an unacceptable cumulative evacuation bottleneck on Country Club Drive; and (2) because it is inconsistent with the Harmony Grove Community Plan component of the General Plan as well as several Land Use and Safety Elements.

In fact, the Proposed Project is arguably infeasible. (1) because the area road infrastructure is insufficient to support the project density; and (2) the project is inconsistent with the General Plan in terms of Community Plan consistency, as well as Land Use Element LU-6.10 and Safety Elements S-1.1, S-2.6, S-3.5 and S-3.6 concerning wildland urban interface related hazards and safety.

Given the objectively favorable comparison of the Valiano Vineyards alternative to the General Plan Density alternative and the Proposed Project; and given that we have exhaustively demonstrated that the alternative meets the technical requirements of CEQA for consideration,

and offers the best balance of benefits to all stakeholders; and given that exclusion of the alternative obviates a reasoned choice by decision makers, consideration of the Valiano Vineyards alternative is indeed warranted and the alternative should be considered by the County of San Diego as lead agency reviewing the Valiano project.

Sincerely,

A handwritten signature in black ink, appearing to be "Scott C Sutherland", written in a cursive style.

Scott C Sutherland, Valiano Chair

Enc: Valiano Vineyards alternative