

Ehsan, Beth

From: Dan Silver <dsilverla@me.com>
Sent: Wednesday, June 10, 2015 12:32 PM
To: Ehsan, Beth
Cc: Loy, Maggie A; Wardlaw, Mark; Gretler, Darren M; Spurgin, Andrew; Elias, Alexandra; Fogg, Mindy; Farace, Joseph; Citrano, Robert; Bray, Kelly; Lacey, Cara
Subject: Valiano Specific Plan

June 10, 2015

Beth Ehsan
Dept of Planning and Development Services
5510 Overland Ave Suite 310
San Diego, CA 92123

RE: Valiano Specific Plan and DEIR

Dear Ms Ehsan:

Endangered Habitats League (EHL) appreciates the opportunity to comment on this proposed project.

This proposed General Plan amendment in San Dieguito/Harmony Grove would change SR 1 and 2 to SR 0.5, resulting in a substantial increase in density. Via the adopted General Plan of 2011, this community accepted Harmony Grove Village as an urban/suburban node and anticipated certainty for continued rural uses elsewhere. *There is no demonstrable need for increased housing capacity beyond the robust population targets built into the 2011 Update.* The proposed GPA would cause a large change to community character and aesthetics from existing conditions. While the document argues that such density would be located within reasonable proximity to urban centers and transit in San Marcos and Escondido, it is not within the accepted 1/4-mile walking distance. Development within municipal boundaries would be a superior way to meet locational tests for transit accessibility. And neither the County nor SANDAG has identified the Valiano site as a Smart Growth Opportunity Area. Thus, we do not find a compelling planning rationale for the proposed GPA.

EHL generally supports smaller lots as opposed to dispersed 1 and 2 and 4-acre estate lots. However, the use of smaller lots should be accompanied by significant preservation of intact natural or agricultural resources. That is not the case here, as compensatory benefits are paltry. Preserved agriculture is small compared to the development area and on the steepest slopes. The biological open spaces are small and isolated. As an alternative that should be considered, EHL recommends lot area averaging or use of the Conservation Subdivision *based on existing densities and unit yield.* This might allow 50% of the site to be preserved as agriculture or recovering natural habitat.

Finally, the County's LARA model for agriculture impacts remains a *wretched* tool. It is, frankly, an affront to San Diego's important agricultural resources. Here, only 13 acres of well over 100 acres of orchards and intensive agriculture were considered significant and worthy of mitigation. It is long past time to discontinue use of the LARA model as inappropriate to San Diego's local and unique farm values.

Thank you for considering our views, and if you might acknowledge receipt, that would be appreciated.

Yours truly,
Dan Silver

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