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**County of San Diego**  
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**NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT**

June 20, 2013

NOTICE IS HEREBY GIVEN that the County of San Diego, Planning & Development Services, will be the Lead Agency and will prepare an Environmental Impact Report in accordance with the California Environmental Quality Act for the following projects. The Department is seeking public and agency input on the scope and content of the environmental information to be contained in the Environmental Impact Report. A Notice of Preparation document, which contains a description of the probable environmental effects of the project, can be reviewed on the World Wide Web at [http://www.sdcounty.ca.gov/pds/ceqa\\_public\\_review.html](http://www.sdcounty.ca.gov/pds/ceqa_public_review.html), at the Planning & Development Services (PDS), Project Processing Counter, 5510 Overland Avenue, Suite 110, San Diego, California 92123 and at the public libraries listed below. Comments on the Notice of Preparation document must be sent to the PDS address listed above and should reference the project number and name.

**PDS2013-SP-13-001, LOG NO. ER-13-08-002; VALIANO.** The project is a Specific Plan, General Plan Amendment, Rezone, Vesting Tentative Map, and Site Plan for a 362 lot residential subdivision on 209 acres. The project is located south of Hill Valley Drive, north of Harmony Heights Road, west of Country Club Drive and east of Seeforever Drive in the Eden Valley portion of the San Dieguito Community Planning Area within the unincorporated area of San Diego County, between San Marcos and Escondido. A public EIR scoping meeting will be held at the Elfin Forest Fire Station at 20223 Elfin Forest Rd, Elfin Forest, CA 92029 on Wednesday, July 10<sup>th</sup> at 7:00 p.m. Comments on this Notice of Preparation document must be received no later than **July 19 at 4:00 p.m.** (a 30 day public review period). This Notice of Preparation can also be reviewed at the San Marcos Library, located at 2 Civic Center Drive, San Marcos, CA 92069; and the Escondido Library, located at 239 S. Kalmia Street, Escondido, CA 92025. For additional information, please contact Beth Ehsan at (858) 694-3103 or by e-mail at [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov).

**SDC PDS RCVD 04-28-15**  
**SP13-001, GPA13-001,**  
**STP13-003, TM5575**  
**REZ13-001, ER-12-08-002**





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**NOTICE OF PREPARATION DOCUMENTATION**

**DATE:** June 20, 2013

**PROJECT NAME:** Valiano

**PROJECT NUMBER(S):** PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-STP-13-003, PDS2013-TM-5575,

**PROJECT APPLICANT:** Integral Communities, 2235 Encinitas Blvd, Suite 216, Encinitas, CA 92024

**ENV. REVIEW NUMBER:** PDS2013-ER-13-08-002

**PROJECT DESCRIPTION:**

The project is a general plan amendment, specific plan, rezone, site plan and major subdivision to develop 362 residential lots on 209.3 acres. The site is located in the Eden Valley area of the San Dieguito Community Planning Area, between the cities of San Marcos and Escondido within unincorporated San Diego County. The project site is located on Mt. Whitney Road at Country Club Drive.

The site is subject to the General Plan Semi-Rural Regional Category, Semi-Rural 1 (SR-1) and Semi-Rural 2 (SR-2) Land Use Designation. The project would require a General Plan Amendment to change the designation to Semi-Rural 0.5 (SR-0.5). Zoning for the site is Agricultural (A70). The site contains a one home to be removed and a historic barn to remain. The property is currently zoned A70 with minimum lots sizes of 1 and 2 acres. A Rezone would be required to reduce the minimum lot size and change the A70 areas to RS. A Specific Plan and Site Plan would establish setbacks, etc, which will vary across the five proposed neighborhoods.

The proposed project is a private gated residential development of 362 residential lots and 17 open space lots and easements of 109 acres, with preservation of both agriculture and native habitats. Proposed minimum lot size ranges from 4,500 square feet in neighborhood 1 to 7,000 square feet in neighborhoods 2 and 3. Typical surrounding lot sizes are 2 to 4 acres to the west and 1 acre to the east. To the

northeast are mobile home parks and to the north across La Moree are 5,000 square foot lots. To the south is the Harmony Grove Village Specific Plan, Planning Area 3, which is planned for a density of just over 1 dwelling unit per acre and lot sizes of approximately one half acre. The Village boundary is located about one-quarter mile south of neighborhoods 1 and 2, and adjoins the southwestern edge of neighborhood 5. The project would take access from Hill Valley Drive, Mount Whitney Road, and Country Club Drive. Offsite improvements on Country Club Drive may be required. Proposed grading is 700,000 cubic yards of balanced cut and fill (average 3,500 cubic yards per acre). The project would also include public multi-use trails, smaller private trails, an equestrian staging area and park land. Water service would be provided by the Rincon del Diablo Municipal Water District; the preferred option for sewer service is a wastewater treatment plant operated by the San Diego County Sanitation District. If the Vallecitos Municipal Water District sewer option is selected, an offsite sewer line extension would be required. The proposed fire service provider is the San Marcos Fire Protection District.

**PROJECT LOCATION:**

The project includes 12 parcels and 209.3 acres located mostly north of Mount Whitney Road and west of Country Club/Harmony Grove Drive in the Eden Valley portion of the San Dieguito Community Planning Area of unincorporated San Diego County.

**PROBABLE ENVIRONMENTAL EFFECTS:**

The probable environmental effects associated with the project are detailed in the attached Environmental Initial Study. All questions answered "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" will be analyzed further in the Environmental Impact Report. All questions answered "Less than Significant Impact" or "Not Applicable" will not be analyzed further in the Environmental Impact Report.

The following is a list of the subject areas to be analyzed in the EIR and the particular issues of concern:

Aesthetics, Agriculture and Forest Resources, Air Quality, Biological Resources, Cultural Resources, Geology & Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology & Water Quality, Land Use & Planning, Noise, Population & Housing, Public Services, Recreation, Transportation/Traffic, Utilities & Service Systems

**Attachments:**

- Project Regional Location Map
- Project Detailed Location Map
- Plot Plan Exhibit
- Environmental Initial Study





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June 14, 2013

**CEQA Initial Study - Environmental Checklist Form**  
**(Based on the State CEQA Guidelines, Appendix G)**

1. Title; Project Number(s); Environmental Log Number:  
  
VALIANO; PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-STP-13-003,  
PDS2013-TM-5575, PDS2013-REZ-13-001, PDS2013-ER-12-08-002
2. Lead agency name and address:  
County of San Diego, Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123-1239
3. Contact: Beth Ehsan, Project Manager  
Phone number: 858-694-3103  
E-mail: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov).
4. Project location:  
The project includes 12 parcels and 209.3 acres located mostly north of Mount Whitney Road and west of Country Club/Harmony Grove Drive in the Eden Valley portion of the San Dieguito Community Planning Area of unincorporated San Diego County.  
  
Thomas Guide Coordinates: Page 1129, Grids B2, 3, & 4; C3 & 4
5. Project Applicant name and address:  
  
Eden Hills Project Owner, LLC  
Lance Waite, Integral Communities  
2235 Encinitas Blvd, #216  
Encinitas, CA 92024  
[lwaite@integralcommunities.com](mailto:lwaite@integralcommunities.com)

6. General Plan  
Community Plan: San Dieguito  
Land Use Designation: Semi-Rural 2 (SR-2)  
Density: 0.5 du/ acre  
Floor Area Ratio (FAR) n/a
7. Zoning  
Use Regulation: A-70  
Minimum Lot Size: 1 and 2 acres  
Special Area Regulation: -- /C
8. Description of project:

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The site is subject to the General Plan Semi-Rural Regional Category, Semi-Rural 1 (SR-1) and Semi-Rural 2 (SR-2) Land Use Designation. The project would require a General Plan Amendment to change the designation to Semi-Rural 0.5 (SR-0.5). Zoning for the site is Agricultural (A70). The site contains one home and other structures to be removed and a historic barn to remain. The property is currently zoned A70 with minimum lots sizes of 1 and 2 acres. A Rezone would be required to reduce the minimum lot size and change the A70 areas to RS. A Specific Plan and Site Plan would establish setbacks, etc, which will vary across the five proposed neighborhoods.

The project proposes a private gated residential development of 362 residential lots and 17 open space lots and easements of 109 acres, with preservation of both agriculture and native habitats. Proposed minimum lot size ranges from 4,500 square feet in neighborhood 1 to 7,000 square feet in neighborhoods 2 and 3. Typical surrounding lot sizes are 2 to 4 acres to the west and 1 acre to the east. To the northeast are mobile home parks and to the north across La Moree are 5,000 square foot lots. To the south is the Harmony Grove Village Specific Plan, Planning Area 3, which is planned for a density of just over 1 dwelling unit per acre and lot sizes of approximately one half acre. The Village boundary is located about one-quarter mile south of neighborhoods 1 and 2, and adjoins the southwestern edge of neighborhood 5. The project would take access from Hill Valley Drive, Mount Whitney Road, and Country Club Drive. Offsite improvements on Country Club Drive may be required. Proposed grading is 700,000 cubic yards of balanced cut and fill (average 3,500 cubic yards per acre). The project would also include public multi-use trails, smaller private trails, an equestrian staging area and park land. Water service would be provided by the Rincon del Diablo Municipal Water District. The preferred option for sewer service is a wastewater treatment plant operated by the San Diego County

Sanitation District. If the Vallecitos Municipal Water District sewer option is selected, an offsite sewer line extension would be required. The proposed fire service provider is the San Marcos Fire Protection District.

9. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

<b><u>Permit Type/Action</u></b>	<b><u>Agency</u></b>
General Plan Amendment	County of San Diego
Major Use Permit (WWTP)	County of San Diego
Site Plan	County of San Diego
Rezone	County of San Diego
Specific Plan	County of San Diego
Vesting Tentative Map	County of San Diego
Road Opening	County of San Diego
County Right-of-Way Permits	County of San Diego
Construction Permit	
Excavation Permit	
Encroachment Permit	
Grading Permit	County of San Diego
Habitat Loss Permit	County of San Diego
401 Permit - Water Quality Certification	Regional Water Quality Control Board (RWQCB)
404 Permit – Dredge and Fill	US Army Corps of Engineers (ACOE)
1603 – Streambed Alteration Agreement	CA Department of Fish and Wildlife (CDFW)
Section 7 - Consultation or Section 10a Permit – Incidental Take	US Fish and Wildlife Services (USFWS)
Air Quality Permit to Construct	Air Pollution Control District (APCD)
Air Quality Permit to Operate – Title V Permit	APCD
National Pollutant Discharge Elimination System (NPDES) Permit	RWQCB
General Industrial Stormwater Permit	RWQCB
General Construction Stormwater Permit	RWQCB
Fire District Approval	San Marcos Fire Protection District
Water District Approval	Rincon Del Diablo Municipal Water District
School District Approval	Escondido Union School District
	Escondido Union High School District
McClellan- Palomar Airport Land Use Compatibility Determination	San Diego Regional Airport Authority
Annexation and Formation Approval	Local Agency Formation Commission

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:** The environmental factors checked below would be potentially affected by this project and involve at least one

impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

- |   |   |   |
|---|---|---|
| <input checked="" type="checkbox"/> <u>Aesthetics</u>               | <input checked="" type="checkbox"/> <u>Agriculture and Forest Resources</u> | <input checked="" type="checkbox"/> <u>Air Quality</u>                        |
| <input checked="" type="checkbox"/> <u>Biological Resources</u>     | <input checked="" type="checkbox"/> <u>Cultural Resources</u>               | <input checked="" type="checkbox"/> <u>Geology &amp; Soils</u>                |
| <input checked="" type="checkbox"/> <u>Greenhouse Gas Emissions</u> | <input checked="" type="checkbox"/> <u>Hazards &amp; Haz. Materials</u>     | <input checked="" type="checkbox"/> <u>Hydrology &amp; Water Quality</u>      |
| <input checked="" type="checkbox"/> <u>Land Use &amp; Planning</u>  | <input type="checkbox"/> <u>Mineral Resources</u>                           | <input checked="" type="checkbox"/> <u>Noise</u>                              |
| <input checked="" type="checkbox"/> <u>Population &amp; Housing</u> | <input checked="" type="checkbox"/> <u>Public Services</u>                  | <input checked="" type="checkbox"/> <u>Recreation</u>                         |
| <input checked="" type="checkbox"/> <u>Transportation/Traffic</u>   | <input checked="" type="checkbox"/> <u>Utilities &amp; Service Systems</u>  | <input checked="" type="checkbox"/> <u>Mandatory Findings of Significance</u> |

**DETERMINATION:** (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ On the basis of this Initial Study, Planning & Development Services finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, Planning & Development Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Beth Ehsan  
Signature

6/17/13  
Date

Beth Ehsan  
Printed Name

Land Use/Environmental Planner  
Title

**INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS**

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance

**I. AESTHETICS** -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands, but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups. The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

The San Dieguito Community Plan states that the most scenic views in Harmony Grove are of the hills, valleys, riparian habitat, and grazing farm animals; and that these visual qualities must be preserved. In addition, there are two issues related to scenic resources cited:

**Issue COS-1.5** Elfin Forest Road / Harmony Grove Road is on the County Scenic Highway System. Harmony Grove Road has many curves with rocks cut on one side and Escondido Creek with mature vegetation and native wildflowers and rugged mountains lining the other side. It is included in the Conservation and Open Space Element as a County Scenic Corridor.

The project site is approximately 1800 feet from Escondido Creek, and a tributary to Escondido Creek is within the southern part of the project. There are several other vantage points in the vicinity, including Seeforever Drive which overlooks the site from the west, and the public trail behind the new Palomar Pomerado Hospital building which is approximately 4,000 feet to the east and northeast. Including the above scenic vistas, the site may be located near or visible from a scenic vista and may not change the composition of an existing scenic vista. A Visual Resources Report for the proposed project must be prepared. Based on the results of the visual resources analysis, the project may be required to incorporate avoidance, mitigation or design features to be compatible with the existing visual environment in terms of visual character and quality.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

**No Impact:** State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

Based on a site visit completed by County staff, the proposed project is not located near or visible within the composite viewshed of a State scenic highway and will not damage or remove visual resources within a State scenic highway. Therefore, the proposed project will not have any substantial adverse effect on a scenic resource within a State scenic highway.

- c) Substantially degrade the existing visual character or quality of the site and its surroundings?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Potentially Significant Impact:** Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers. The proposed grading is 700,000 cubic yards of balanced cut and fill (average of 3,500 cubic yards per acre). The proposed density of the project is 0.5 dwelling units per acre.

The existing visual character and quality of the project site and surrounding area is characterized by the San Dieguito Community Plan as non-industrial with low densities, which preserve the community's historic rural agricultural character. Per the Elfin Forest Harmony Grove Community Plan, "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." With the proposed change in density and volume of earthwork, a detailed visual analysis must be included in the EIR to address the potential aesthetic and landform modification impacts for both on-site and off-site improvements.

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Less Than Significant Impact:** The proposed project will use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 40 miles from the Mount Palomar Observatory. However, it will not adversely affect nighttime views or astronomical observations, because the project will conform to the Light Pollution Code (Section 59.101-59.115), including the lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting.

In addition, the proposed project will control outdoor lighting and sources of glare in the following ways:

1. The project will not install outdoor lighting that directly illuminates neighboring properties.
2. The project will not install outdoor lighting that would cast a direct beam angle towards a potential observer, such as a motorists, cyclist or pedestrian.

3. The project will not install outdoor lighting for vertical surfaces such as buildings, landscaping, or signs in a manner that would result in useful light or spill light being cast beyond the boundaries of intended area to be lit.
4. The project will not install any highly reflective surfaces such as glare-producing glass or high-gloss surface color that will be visible along roadways, pedestrian walkways, or in the line of sight of adjacent properties.

The project will not contribute to significant cumulative impacts on day or nighttime views because the project will conform to the Light Pollution Code. The Code was developed by the San Diego County Planning & Development Services and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Therefore, compliance with the Code ensures that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

The project's outdoor lighting may be controlled through Site Plan conditions. Therefore, compliance with the Code, in combination with the outdoor lighting and glare controls listed above ensures that the project will not create a significant new source of substantial light or glare.

## **II. AGRICULTURE AND FORESTRY RESOURCES** -- Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** The project site has land designated as Unique Farmland and Farmland of Local Importance according to the State Farmland Mapping and Monitoring Program (FMMP). In addition, based on a site visit and a review of historic aerial photography, there is evidence of agricultural use on the project site. The site will be evaluated to determine the importance of the resource based on the County's Local Agricultural Resources Assessment (LARA) model which takes into account local factors that define the importance of San Diego County agricultural resources. The LARA model considers the availability of water resources, climate, soil quality, surrounding land use, topography, and land use or parcel size consistency between the project site and surrounding land uses. A more detailed discussion of the LARA model can be found in the Guidelines for Determining Significance for Agricultural Resources at <http://www.sdcounty.ca.gov/pds/docs/AG-Guidelines.pdf>. In order for a site to be considered an important agricultural resource based on the LARA model, all three required LARA model factors (water, soil, and climate) must receive either a high or moderate score. A low score in any of these three categories would render a LARA model result that the site is not an important agricultural resource. As such, potentially significant project or cumulative level conversion of



Unique Farmland and/or Farmland of Local Importance to a non-agricultural use may occur as a result of this project. Therefore, any potential agricultural impacts from the project must be analyzed in an Agricultural Analysis and discussed in the context of the EIR.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** The project site and the surrounding area are zoned for agricultural use (A-70). The project proposes a rezone and lot sizes that do not allow for agriculture. Therefore, the proposed project may create a conflict with existing uses and zoning. Potential agricultural impacts from the project must be analyzed in an Agricultural Analysis and discussed in the context of the EIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

**No Impact:** The project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of offsite forest resources.

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

**No Impact:** The project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of offsite forest resources.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** The project site and surrounding area contain active agricultural operations and lands designated as Unique Farmland and Farmland of Local

Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. As such, potentially significant project or cumulative level conversion of agricultural land to a non-agricultural may occur as a result of this project. Therefore, any potential agricultural impacts from the project must be analyzed in an Agricultural Analysis and discussed in the context of the EIR.

**III. AIR QUALITY** -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** The project involves a General Plan Amendment that would result in approximately 125 additional residences (an increase from 237 to 362 units based on data reported in the Air Quality Study) than currently allowed on the project site. This development was not anticipated in SANDAG growth projections used in development of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP) and may conflict with or obstruct implementation of either the RAQS or applicable portions of the SIP on a project level. One result may be project emissions of ozone precursors that were not considered as a part of the RAQS based on growth projections.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** In general, air quality impacts from land use projects are the result of emissions from motor vehicles, and from short-term construction activities associated with such projects. The San Diego County Land Use Environment Group (LUEG) has established guidelines for determining significance which incorporate the San Diego Air Pollution Control District's (SDAPCD) established screening-level criteria for all new source review (NSR) in APCD Rule 20.2. These screening-level criteria can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since SDAPCD does not have screening-level criteria for emissions of volatile organic compounds (VOCs), the screening level for reactive organic compounds (ROC) from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which are more appropriate for the San Diego Air Basin) are used.

The project involves extensive construction activity along with blasting onsite. Construction activities associated with the project will be phased; therefore, certain phases of the project would be operational while construction is ongoing onsite. Construction and operation of the proposed project would lead to emissions that could violate an air quality standard or contribute substantially to an existing or projected air quality violation. Air emissions from the project would be evaluated through a technical analysis to quantify maximum daily emissions that can be

compared to the appropriate screening level thresholds, and identify mitigation measures, as necessary.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** San Diego County is presently in non-attainment for the 1-hour concentrations under the National and California Ambient Air Quality Standard (NAAQS and CAAQS) for Ozone ( $O_3$ ). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns ( $PM_{10}$ ) and 2.5 microns ( $PM_{2.5}$ ) under the CAAQS.  $O_3$  is formed when VOC and nitrogen oxides ( $NO_x$ ) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of  $PM_{10}$  in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

As described in (b) above, construction and operation of the project and overlap between different phases would lead to substantial emissions of air pollutants. In particular, emissions of VOCs,  $NO_x$ ,  $PM_{10}$ , and  $PM_{2.5}$  could exacerbate ambient air quality conditions in San Diego County, especially considering the nonattainment status of the region with respect to these pollutants. Air emissions from the project will be evaluated and mitigation measures, as necessary, will be proposed as described above.

- d) Expose sensitive receptors to substantial pollutant concentrations?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** Air quality regulators typically define sensitive receptors as schools (Preschool-12<sup>th</sup> Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

Existing sensitive receptors within ¼ mile of the project vicinity include several existing residences to the west, northeast, east, and southeast. There are no schools, hospitals, or other sensitive receptors within this distance of the project site. Since construction activity will be phased, the project would introduce sensitive receptors onsite while construction is ongoing. Two primary emissions of concern for impacts to sensitive receptors are carbon monoxide (CO) and diesel particulate matter (DPM). Impacts to onsite and offsite receptors need to be addressed through a technical analysis.

- e) Create objectionable odors affecting a substantial number of people?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
|---|---|

- ☒ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Less Than Significant With Mitigation Incorporated:** The project could produce objectionable odors, which would result from volatile organic compounds, ammonia, carbon dioxide, hydrogen sulfide, methane, alcohols, aldehydes, amines, carbonyls, esters, disulfides dust and endotoxins from the construction and operational phases. In addition, the project could produce objectionable odors, which would result from the proposed sewage treatment plant and equestrian staging area. These uses would need to incorporate measures to reduce the exposure of sensitive receptors to odors. Impacts and mitigation measures will be assessed in a technical analysis.

**IV. BIOLOGICAL RESOURCES -- Would the project:**

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

- ☒ Potentially Significant Impact ☐ Less than Significant Impact  
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Potentially Significant Impact:** The site is known to support several sensitive habitats, which support and have the potential to support endangered, threatened, or rare plant or animal species. The site supports the following sensitive habitats: southern riparian forest, southern riparian woodland, southern willow scrub, mule fat scrub, freshwater marsh, herbaceous wetland, disturbed wetland, pond, tamarisk scrub, coastal sage scrub, coast live oak woodland, southern mixed chaparral, non-native grassland, and field pasture. Pursuant to the CEQA and the Resource Protection Ordinance (in addition to state and federal laws), impacts to listed, or otherwise rare species must be minimized and often avoided entirely.

Therefore, based on the fact that the site has the potential to support several endangered, threatened, or rare plant or animal species or their habitats, the project may have a potentially significant impact on biological resources. As such any potentially significant adverse effects, including noise from construction or the project, to endangered, threatened, or rare plant or animal species or their habitats must be addressed in the context of the biological technical study and the EIR.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

- ☒ Potentially Significant Impact ☐ Less than Significant Impact  
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Potentially Significant Impact:** The site supports a number of wetland habitats and wetland buffers that were identified on a site visit conducted by Beth Ehsan and Maggie Loy on March 11, 2013. These wetlands and wetland buffers may be significantly impacted by the proposed project and as proposed the project may not conform to the wetland and wetland buffer regulations within the Resource Protection Ordinance. Therefore, impacts to wetlands and

wetland buffers and conformance with the Resource Protection Ordinance must be demonstrated and discussed in the context of a biological technical study and the EIR.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Potentially Significant Impact:** The site contains a number of significant drainages and wetland habitats, specifically, a primary tributary to Escondido Creek and several drainages that bisect the project site, which if impacted may result in significant alterations to known watersheds or wetlands that may be considered California Department of Fish and Game and/or Army Corps of Engineers jurisdictional wetlands or waters, and would potentially require a Section 1603 "Streambed Alteration Agreement" and/or 404 Permit. Therefore, all significant drainages and wetlands must be defined and impacts identified in a biological technical study and in the EIR.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Potentially Significant Impact:** Potential wildlife corridors exist throughout the project site along natural drainages through various sensitive habitats, including: Diegan coastal sage scrub, riparian areas and wetlands. The current project design may potentially impact these corridors and may create additional indirect impacts through increased noise and activity. Therefore, any potentially significant impacts to wildlife movement patterns, wildlife dispersal corridors, and use of native wildlife nursery sites must be discussed in the biological technical study and the EIR.

- e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Potentially Significant Impact:** The project is being reviewed for consistency with the Natural Communities Conservation Plan (HLP Ordinance and Planning Agreement), Habitat Management Plans (HMP), Special Area Management Plans (SAMP), the Resource Protection Ordinance (RPO), and Habitat Loss Permit (HLP). Therefore, any potentially significant conflicts must be discussed in the biological technical study and the EIR.

**V. CULTURAL RESOURCES** -- Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** A number of historical resources have been identified within a mile radius of the site. As a result, the project may grade, disturb, or threaten a potentially significant historical artifact, object, structure, or site. Therefore, the potential for impacts to historic structures will be evaluated in the archaeological survey and discuss the survey results in the context of the EIR.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** A number of archaeological resources have been identified within a mile radius of the site. As a result, the project may grade, disturb, or threaten a potentially significant archaeological or cultural artifact, object, structure, or site. Therefore, the project must complete an archaeological survey and discuss the survey results in the context of the EIR.

c) Directly or indirectly destroy a unique geologic feature?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

**No Impact:** San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County. After review of the San Dieguito Community Plan and a site visit by Maggie Loy on March 11, 2013, it has been determined that the site does not contain any unique geologic features nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

d) Directly or indirectly destroy a unique paleontological resource or site?

- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that potentially contain unique paleontological resources. Excavating into undisturbed ground beneath the soil horizons may cause a significant impact if unique paleontological resources are encountered. Since an

impact to paleontological resources does not typically occur until the resource is disturbed, monitoring during excavation is the essential measure to mitigate potentially significant impacts to unique paleontological resources to a level below significance. Therefore, the EIR must disclose the following information about the potential impacts to paleontological resources.

The project has low/marginal potential for containing paleontological resources and will excavate the substratum and/or bedrock below the soil horizons. A monitoring program implemented by the excavation/grading contractor will be required. Equipment operators and others involved in the excavation should watch for fossils during the normal course of their duties. In accordance with the Grading Ordinance, if a fossil or fossil assemblage of greater than twelve inches in any dimension is encountered during excavation, all excavation operations in the area where the fossil or fossil assemblage was found shall be suspended immediately, the County's Permit Compliance Coordinator shall be notified, and a Qualified Paleontologist shall be retained by the applicant to inspect the find to determine if it is significant. A Qualified Paleontologist is a person who has, to the satisfaction of the Planning and Land Use Director:

- A Ph.D. or M.S. or equivalent in paleontology or closely related field (e.g., sedimentary or stratigraphic geology, evolutionary biology, etc.);
- Demonstrated knowledge of southern California paleontology and geology; and
- Documented experience in professional paleontological procedures and techniques.

If the Qualified Paleontologist determines that the fossil or fossil assemblage is significant; a mitigation program involving salvage, cleaning, and curation of the fossil(s) and documentation shall be implemented. If no fossils or fossil assemblages of greater than 12 inches in any dimension are encountered during excavation, a "No Fossils Found" letter will be submitted to the County Planning & Development Services identifying who conducted the monitoring and that no fossils were found. If one or more fossils or fossil assemblages are found, the Qualified Paleontologist shall prepare a report documenting the mitigation program, including field and laboratory methodology, location and the geologic and stratigraphic setting, list(s) of collected fossils and their paleontological significance, descriptions of any analyses, conclusions, and references cited.

Therefore, with the implementation of the above project requirements during project grading operations, potential impacts to paleontological resources will be less than significant. Furthermore, the project will not result in a cumulative impact to paleontological resources because other projects that require grading in sensitive paleontological resource areas will be required to have the appropriate level of paleontological monitoring and resource recovery. In addition, other projects that propose any amount of significant grading would be subject to the requirements for paleontological monitoring as required pursuant to the County's Grading Ordinance. Therefore, the project would not result in a significant direct, indirect, or cumulatively significant loss of paleontological resources.

e) Disturb any human remains, including those interred outside of formal cemeteries?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** A number of archaeological resources have been identified within a mile radius of the site. As a result, the project may grade, disturb, or threaten a potentially significant archaeological, historical, or cultural artifact, object, structure, or site. Therefore, the project must complete an archaeological survey and discuss the survey results in the context of the EIR.

**VI. GEOLOGY AND SOILS** -- Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

**No Impact:** The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. Therefore, there will be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project.

- ii. Strong seismic ground shaking?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Less Than Significant Impact:** Although the project site is not located in a hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, the project site is subject to ground shaking from seismic activity. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. Therefore, compliance with the California Building Code and the County Code ensures the project will not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking. The EIR must include appropriate discussion and design measures to address this issue.

- iii. Seismic-related ground failure, including liquefaction?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Less Than Significant With Mitigation Incorporated:** The geology of the project site is identified as both plutonic and marine/nonmarine sedimentary deposits. The sedimentary deposits are susceptible to ground failure including liquefaction from seismic activity. Feasible foundation designs exist that can mitigate the liquefaction hazard (including liquefaction-induced lateral spreading). A geotechnical study shall be reviewed and approved which specifies foundation design adequate to preclude substantial damage to the proposed structures due to liquefaction. With a site-specific engineering design, impacts due to liquefaction would be less than significant. Therefore, there is a less than significant impact from the exposure of people to adverse effects from a known area susceptible to ground failure.



## iv. Landslides?

- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** Portions of the site are located within a landslide susceptibility zone and a significant impact may result from the exposure of people or structures to adverse effects from an area susceptible to landslides. A Geotechnical Report has been required and the EIR must include appropriate discussion and measures required in order to determine if either pre-existing or potential conditions are present that could become unstable in the event of seismic activity.

## b) Result in substantial soil erosion or the loss of topsoil?

- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** According to the Soil Survey of San Diego County, the soils on-site are identified as follows:

Soil Type		Erosion Index
VaB	Visalia sandy loam, 2 to 5% slopes	Severe 16
VsC	Visalia coarse sandy loam, 5 to 9% slopes	Moderate 2
ChB	Chino fine sandy loam, 2 to 5% slopes	Severe 16
CmE2	Cienega rocky coarse sandy loam, 9 to 30% slopes	Severe 16
CmrG	Cienega very rocky coarse sandy loam, 30 to 75% slopes	Severe 1
EsD2	Escondido very fine sandy loam, 9 to 15% slopes	Severe 16
FvD & E	Fallbrook-Vista sandy loams, 15 to 30% slopes	Severe 16
HrC	Huerhuero loam, 2 to 9% slopes	Severe 9
LpD2	Las Posas fine sandy loam, 9 to 15% slopes, eroded	Moderate 2
PfC	Placentia sandy loam, thick surface, 2 to 9% slopes	Severe 16
WmB	Wyman loam, 2 to 5% slopes	Moderate 2

These soils have a soil erodibility rating of "moderate" or "severe" as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. The proposed project may result in unprotected erodible soils, may alter existing drainage patterns, may be located a wetland or significant drainage feature, and may develop steep slopes. Even though, the project is required to comply with the Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING) of Division 7, EXCAVATION AND GRADING, of the San Diego County Zoning and Land Use Regulations, erosion potential from the project must be discussed in the context of the EIR and include measures under the following categories:

- The project will not result in unprotected erodible soils; will not alter existing drainage patterns; is not located in a floodplain, wetland, or significant drainage feature; and will not develop steep slopes.
- The project has prepared a Storm water Management Plan that includes Best Management Practices (BMPs) to ensure sediment does not erode from the project site:
- The project involves grading. However, the project is required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING). Compliance with these regulations minimizes the potential for water and wind erosion.

It is not expected that the project will contribute to a cumulatively considerable impact because all cumulative projects that involve grading or land disturbance are required to follow the requirements of the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING); Order 2001-01 (NPDES No. CAS 0108758), adopted by the San Diego Region RWQCB on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ord. No. 9424); and County Storm Water Standards Manual adopted on February 20, 2002, and amended January 10, 2003 (Ordinance No. 9426).

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** The proposed project involves grading that would result in the creation of areas of cut and areas underlain by fill. In order to assure that any proposed buildings (including those proposed on the project site) are adequately supported (whether on native soils, cut or fill), a Soils Engineering Report is required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a Building Permit. Additionally, sedimentary deposits at the site have the potential to be susceptible to liquefaction. Mitigation measures for any structures, roadways, or other improvements will be required to be addressed in the geotechnical investigation being prepared for the project. With mitigation for liquefaction and a standard required soils engineering report for the project, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to VI Geology and Soils, Question a., iii-iv listed above. For further information regarding landslides, liquefaction, and lateral spreading, refer to VI Geology and Soils, Question a., iii-iv listed above.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

**Less Than Significant Impact:** The project is located on expansive soils as defined within Table 18-1-B of the Uniform Building Code (1994). This was confirmed by staff review of the

Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. The soils on-site are Las Posas, Huerhuero, Placentia, and Wyman loams with high and moderate shrink/swell characteristics. However the project will not have any significant impacts because the project is required to comply with the improvement requirements identified in the 1997 Uniform Building Code, Division III – Design Standard for Design of Slab-On-Ground Foundations to Resist the Effects of Expansive Soils and Compressible Soils, which ensure suitable structure safety in areas with expansive soils. Therefore, these soils will not create substantial risks to life or property.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

**No Impact:** The project will rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed.

#### **VII. GREENHOUSE GAS EMISSIONS** – Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** Greenhouse Gas (GHG) Emissions are said to result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels. GHGs of concern from the project include carbon dioxide, methane, and nitrous oxide, among others.

The County has prepared *Draft Guidelines for Determining Significance* and *Draft Report Format and Content Requirements* for addressing climate change in CEQA documents. The County has also prepared a Draft Climate Action Plan (CAP) that includes GHG reduction measures that, if fully implemented, would achieve an emissions reduction target that is consistent with the state-mandated reduction target embodied in AB 32.

The Guidelines contain screening criteria for a range of project types and sizes to identify smaller projects that would have less-than-cumulatively considerable GHG emissions impacts. If a proposed project is the same type and equal to or smaller than the project size listed in the Guidelines, it is presumed that construction and operational GHG emissions for that project would not exceed 2,500 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) per year, and there would be a less-than-cumulatively considerable impact. If the project is of a type or size that does not comply with the screening criteria, the project should incorporate all applicable CAP measures and estimate emissions relative to one of the quantified implementing thresholds: Efficiency Threshold, Bright Line Threshold, Stationary Source Threshold, or Performance Threshold.

The project proposes a private gated residential development of 362 residential lots and 17 open space lots and easements of 109 acres, with preservation of both agriculture and native habitats. The screening criterion for single family housing is 86 dwelling units. Therefore, GHG emissions from the project could have a cumulatively considerable impact. A technical analysis needs to be performed to demonstrate that the project's design features, along with relevant CAP measure(s) and, if necessary, additional feasible mitigation measures, are incorporated that would allow the project to be below the chosen implementing threshold.

- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** As discussed in (a) above, the project is above the screening criterion for single family housing developments and could have a cumulatively considerable impact with respect to GHG emissions. Development projects that could have cumulatively considerable GHG emissions impacts need to incorporate relevant measures from the County's CAP and use one of the implementing thresholds from the Significance Guidelines-Efficiency Threshold, Bright Line Threshold, Stationary Source Threshold, or Performance Threshold-to assess significance. The project's consistency with the CAP and County Guidelines needs to be assessed through a technical analysis.

**VIII. HAZARDS AND HAZARDOUS MATERIALS** -- Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** The project proposes an onsite tertiary sewage treatment plant which involves the routine use and storage of hazardous materials. However, the project will be considered and evaluated for storage, handling, transport, emission and disposal of hazardous substances. Operation would require full compliance with local, State, and Federal regulations. California Government Code § 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520. The EIR will disclose and analyze any potential hazardous materials associated with the operation of the plant, which will have ongoing regulations by a major use permit.

The project proposes to demolish or renovate structures on site that were constructed prior to 1980 and that may contain Lead Based Paint (LBP) and Asbestos Containing Materials (ACMs). Lead is a highly toxic metal that was used up until 1978 in paint used on walls, woodwork, siding, windows and doors. Lead containing materials shall be managed by applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 CCR Division 4.5, the worker health and safety requirements (Title 8 CCR Section 1532.1) and the

State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8). Asbestos was used extensively from the 1940's until the late 1970's in the construction industry for fireproofing, thermal and acoustic insulation, condensation control, and decoration. The USEPA has determined that there is no "safe" exposure level to asbestos. It is therefore highly regulated by the USEPA, CalEPA, and the CalOSHA. Demolition or renovation operations that involve asbestos-containing materials must conform to San Diego Air Pollution Control District (SDAPCD) Rules 361.140-361.156. In accordance with existing regulations, the project will be required to complete asbestos and lead surveys to determine the presence or absence of ACMs or LBP prior to issuance of a building permit that includes demolition of onsite structures and prior to commencement of demolition or renovation activities.

While the Phase I ESAs were negative for USTs and ASTs, destruction of existing septic systems and wells will be completed by the San Diego County Department of Environmental Health (DEH). DEH Hazardous Materials Division (DEH HMD) would be involved if underground tanks are discovered during grading as part of the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEH HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity and health risks of hazardous materials stored, used, or disposed of onsite. The plan also contains an emergency response plan which describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local Fire Agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

Therefore, due to the strict requirements that regulate hazardous substances outlined above and the fact that the initial planning, ongoing monitoring, and inspections will occur in compliance with local, State, and Federal regulation; the project will not result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances.

- b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

☐ Potentially Significant Impact  
☐ Less Than Significant With Mitigation Incorporated

☐ Less than Significant Impact  
☒ No Impact

**No Impact:** The project is not located within one-quarter mile of an existing or proposed school. Therefore, the project will not have any effect on an existing or proposed school.

- c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

☒ Potentially Significant Impact

☐ Less than Significant Impact

- ☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Potentially Significant Impact:** Based on a site visit by Geocon (2011, 2012), and a regulatory database search, the project site has not been subject to a release of hazardous substances. The project site is not included in any of the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, the EPA's Superfund CERCLIS database or the EPA's National Priorities List (NPL). Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), is not on or within 1,000 feet of a Formerly Used Defense Site (FUDS), and does not contain a leaking Underground Storage Tank. However, the site does have the potential for contamination from historic agricultural use. Additional soil testing is required to determine whether the site is subject to contamination that would create a hazard to the future residents.

- d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

- ☒ Potentially Significant Impact ☐ Less than Significant Impact  
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Potentially Significant Impact:** The project is located within the Airport Influence Area (AIA) 2 for the Palomar McClellan Airport, which is 8.4 miles to the west. The AIA 2 portion of the project is an overflight notification area and requires FAA notification for hazards to airport safety. That process requires the applicant to file notice to FAA under 14 Code of Federal Regulations, part 77 pursuant to 49 U.S.C., Section 44718 (the highest topographic point of the proposed project with the tallest potential structure allowed by the proposed zoning height designator). FAA makes a determination if the proposed land use action is a potential hazard. If the action is a potential hazard, the County would need to submit an application for a consistency determination from the San Diego Regional Airport Authority (RAA). AIA 2 also requires evidence of an overflight agreement prior to issuing building permits for residences, in compliance with the AIA 2 and site zoning (special "C" designator).

- e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

- ☐ Potentially Significant Impact ☐ Less than Significant Impact  
☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed project is not within one mile of a private airstrip. As a result, the project will not constitute a safety hazard for people residing or working in the project area.

- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

**Less Than Significant Impact:** The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

**No Impact:** The San Diego County Nuclear Power Station Emergency Response Plan will not be interfered with by the project due to the location of the project, plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

**No Impact:** The Oil Spill Contingency Element will not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

**No Impact:** The Emergency Water Contingencies Annex and Energy Shortage Response Plan will not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

**No Impact:** No Dam Evacuation Plan will be interfered with because the project is not located within a dam inundation zone.

- g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** The proposed project is adjacent to wildlands that have the potential to support wildland fires. The project may increase the fire hazard if the project is unable to comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the Fire Protection Districts in San Diego County, as adopted and amended by the local fire protection district, or in the County Fire Code, depending on the best agency selected for fire service. The project will have requirements to ensure that the project will be in compliance with relevant Fire Codes such that the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Compliance with all the fire requirements and specific details of the project's design consideration must be discussed in the context of the EIR.

- h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** The project includes an existing pond that allows water to stand for a period of 72 hours (3 days) or more. It also includes a staging area for equestrians. These two aspects of the project may increase the risk of vectors (mosquitoes and flies) that could result in injury or death to people in the vicinity. A Vector Management Plan must be developed and approved by the County Department of Environmental Health, Vector Surveillance Program to ensure people will not be exposed to vectors. The Vector Management Plan will be discussed in the context of the EIR and analyses.

**VIII. HYDROLOGY AND WATER QUALITY** -- Would the project:

- a) Violate any waste discharge requirements?

- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** The project is required to comply with all waste discharge requirements; however, additional analysis is required to demonstrate compliance. A discussion of special site design considerations, source control Best Management Practices (BMPs) and treatment control BMPs, under the San Diego Municipal Storm Water Permit (SDRWQCB Order No. R9-2007-0001) as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP), and compliance with any other waste discharge requirements must be discussed as a part of the EIR, Stormwater Management Plan (SWMP) and technical study for hydrology as appropriate.

- b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?



- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** The project lies in the Escondido hydrologic subarea, within the Carlsbad hydrologic unit - that is impaired for Coliform bacteria, nutrients, and sediment and may result in an increase of pollutants for which the water body is already impaired. This potential increase must be discussed as a part of the EIR, SWMP and technical study for hydrology as appropriate.

- c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** The project is not anticipated to create or contribute runoff water that would cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives; however, this cannot be determined with the current information available for the proposed project. As a result, applicable surface or groundwater water quality objectives must be discussed as a part of the EIR, SWMP and technical study for hydrology as appropriate.

- d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

**No Impact:** The project will obtain its water supply from the Rincon del Diablo Water District that obtains water from surface reservoirs or other imported water source. The project will not use any groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge including, but not limited to the following: the project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g. ¼ mile). These activities and operations can substantially affect rates of groundwater recharge. Therefore, no impact to groundwater resources is anticipated.

- e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

- |  |   |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact                                | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less Than Significant With Mitigation Incorporated:** The project could alter the existing drainage pattern of the area, through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation because of the substantial grading that is proposed. The applicant will be required to design the project to meet the performance standards of the WPO for flow control and erosion, and surface and ground water quality. Conformance to the WPO must be demonstrated in the context of the EIR, SWMP and technical study for hydrology as appropriate.

- f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Less Than Significant With Mitigation Incorporated:** The proposed project could significantly alter established drainage patterns or significantly increase the amount of runoff. The project could have adverse effect on drainage patterns or the rate or amount of runoff because it could significantly impair, impede or accelerate flow in a watercourse or increase erosion or siltation. The project could have significant flood hazards from external sources. The applicant will be required to show lines of inundation to the 100-year flood on the existing watercourse that flows through the property, which will identify the area not to be used or disturbed. Drainage along roads shall be per County Standards. Building pads will be shown on the plat as located outside the lines of inundation for the 100-year flood plain. The project will be required to address the above-mentioned issues and through a hydrology study be required to identify and analyze any impacts and address appropriate mitigation. Also, these issues are required to be discussed in the EIR.

- g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Less Than Significant With Mitigation Incorporated:** The proposed project could contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems because it proposes significant alteration of the site's landforms and will significantly increase the amount of runoff from impervious surfaces. Therefore, the project could cause significant flood hazards downstream of the site. The project must comply with applicable ordinances and regulations related to storm water and technical reports must be prepared to demonstrate compliance (HMP and SWMP) These issues will be identified and analyzed in the EIR.

- h) Provide substantial additional sources of polluted runoff?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Less Than Significant With Mitigation Incorporated:** The project may involve potential sources of polluted runoff. Therefore, the project must discuss proposed site design measures

and/or source control BMP's and/or treatment control BMP's to be employed to reduce potential pollutants in runoff to the maximum extent practicable and to ensure compliance with applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses in the context of the EIR and technical reports (HMP and SWMP).

- i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

**No Impact:** The drainage swales found onsite are not mapped on a FEMA floodplain map or as a County Floodplain.

- j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Potentially Significant Impact:** Drainage swales, which have a watershed greater than 25 acres occur on the project site and may occur in off-site improvement locations. These areas mapped with a watershed greater than 25 acres have been avoided for placement of structures, such as access roads and other improvements, which may impede or redirect flood flows will be evaluated in the context of the EIR. Potential impacts from flood hazards will be identified and discussed within the EIR.

- k) Expose people or structures to a significant risk of loss, injury or death involving flooding?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Less than Significant Impact:** The project site lies outside any identified special flood hazard area. However, drainage swales, which have a watershed greater than 25 acres occur on the project site and may occur on off-site improvement locations. The proposed residential lots are located at an elevation that would prevent exposure of people or property to flooding. A Drainage Study will be done and presented in the context of the EIR, and flood prevention measures will be incorporated to reduce the risk for people or structures to be exposed to loss injury or death by flooding.

- l) Inundation by seiche, tsunami, or mudflow?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

i. SEICHE

**No Impact:** The project site is not located along the shoreline of a lake or reservoir; therefore, could not be inundated by a seiche.

ii. TSUNAMI

**No Impact:** Tsunami – The project site is located more than a mile from the coast; therefore, in the event of a tsunami, would not be inundated.

iii. MUDFLOW

**Potentially Significant Impact:** Mudflow is type of landslide. The site is located within a "Generally Susceptible" landslide susceptibility zone. However, potential impacts due to landslide and mudflow will be identified and discussed within the EIR and the Geotechnical Report.

**X. LAND USE AND PLANNING** -- Would the project:

a) Physically divide (or isolate) an established community?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** The proposed project is a new residential community with infrastructure (roadways, water supply systems, and utilities) in the Eden Valley community, currently characterized by one to four acre residential lots, many including agricultural and equestrian uses. The project is located on approximately 200 acres of land with the City of San Marcos to the east, the City of Escondido to the north, Eden Valley to the west, and Harmony Grove Village to the south. While the site is mostly vacant at this time, 362 dwelling units, two community areas, a public equestrian staging area and trails are proposed. The degree to which the proposed development would physically isolate the existing semi-rural Eden Valley community will be studied within the EIR.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** A GPA, Specific Plan, and Rezone to change approximately 200 acres from SR-2 and SR-1 to SR-0.5 are proposed. The proposed land use designation of semi-rural 0.5 would allow a more dense development with 0.5 to 2 dwellings per acre on a slope dependant scale.

**Zoning Ordinance:** The following uses are allowed under the current and the proposed zoning:  
a. Residential Use Types: Family Residential; b. Civic Use Types: Essential Services. Fire Protection Services; c. Agricultural Use Types: Horticulture: Cultivation, Tree Crops, Row and Field Crops. Other uses could be permitted with a minor or major use permit. The SR Use Regulations are intended to create and enhance residential areas where agricultural use is compatible with a dominant, permanent residential use is desired. Typically, the SR Use

Regulations would be applied to semi-rural areas where urban levels of service are not available and where transitional or large lots are desired. Various applications of the SR Use Regulations with appropriate development designators can create buffers between residential and agricultural uses, family or small farm areas, or large lot rural residential developments (Zoning Ordinance, Sec. 2180).

Land Use Element: Changes in land use designations must be reviewed in the context of all relevant goals and policies of the General Plan and San Dieguito Community Plan and compliance with County Ordinances and Board of Supervisors' Policies, including limiting extension of urban services into the Semi-Rural and Rural Areas of the County. The preliminary list of goals and policies that will be examined in the context of the EIR includes:

General Plan Guiding Principle 3: Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.

General Plan Policy LU-1.3: Assign land use designations in patterns to create or enhance communities and preserve rural lands.

General Plan Policy LU-2.3: Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

General Plan Policy LU-2.5: Identify and maintain greenbelts between communities to reinforce the identity of individual communities. Maintain continuous open space areas where possible to serve as greenbelts through the site.

General Plan Policy LU-3.1 and 3.2: Support a diversity of residential designations and building types and a mix of housing units in large projects. Also see H-1.8

General Plan Policy LU-6.9: Require developments to conform to the natural topography to limit grading; incorporate and do not significantly alter the dominant physical characteristic of a site.

General Plan Policy LU-5.2: Incorporate into new development sustainable planning and design (comply with County's Climate Action Plan).

General Plan Policy LU-5.3: Ensure the preservation of forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas when permitting development under the Rural and Semi-Rural Land Use Designations.

General Plan Policy LU-7.1: Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

General Plan Policy LU-10.1: Require residential development in Semi-Rural areas to be integrated with existing neighborhoods by providing connected and continuous street, pathway/trail, and recreational open space networks.

General Plan Policy LU-14.4: Require sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the Land Use Map. Sewer systems and services shall not be extended beyond either Village boundaries or extant Urban Limit Lines, whichever is more restrictive, except for... conservation subdivisions.

General Plan Policy S-6.4: The General Plan requires that new development demonstrate that fire services can meet minimum travel times. The Goal for the proposed density of the project is five minutes travel time.

General Plan Policy S-11.5: Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.

General Plan Policy H-1.9: Require developers to provide an affordable housing component when requesting a General Plan amendment for a large-scale residential project.

General Plan Policy M-4.6: Coordinate with adjacent jurisdictions so that roads within Spheres of Influence (SOIs) or that cross jurisdictional boundaries are designed to provide a consistent cross-section and capacity.

General Plan Policy M-9.4: Require developers of large projects to provide, or to contribute to, park-and-ride facilities near freeway interchanges and other appropriate locations that provide convenient access to congested regional arterials.

General Plan Policy COS-15.1: Require that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants.

Community Plan/Harmony Grove SP Policy LU-1.5.1: Require minimum lot sizes of two acres outside the Village Boundary as the standard unless significant preservation of resources is achieved and specific findings are met for the preservation of community character.

Community Plan/Harmony Grove SP Policy LU-1.5.3 and 1.9.2: Provide for lot sizes that will permit residents to keep leisure and market animals on their property and encourage the keeping of equestrian and market animals.

Board Policy I-73 (Hillside Development): Proposed hillside development must be given a special type of analysis and review under Section 66474 of the Government Code (Subdivision Map Act) which requires that the Board of Supervisors disapprove a subdivision if the site is not physically suitable for the proposed density of development.

Board Policy I-78 (Small Wastewater Treatment Facilities): This policy requires sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the General Plan Land Use Map.

In addition, because the project is outside of the existing Sanitation District boundary, it will require annexation and approval by LAFCO. LAFCO is a CEQA "Responsible Agency" and will make its annexation determinations relying upon the project's certified EIR. Therefore, the EIR must consider appropriate LAFCO policies and impact analysis related to the provision of services under LAFCO's purview.

The EIR must also discuss compliance with ordinances and regulations applicable to the project, including but not limited to:

- County of San Diego Resource Protection Ordinance

- County of San Diego Stormwater and Watershed Protection Ordinances

County of San Diego Habitat Loss Permit Ordinance (NCCP)  
County of San Diego Noise Ordinance  
Climate Action Plan  
State and local fire regulations.

**XI. MINERAL RESOURCES** -- Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Less than Significant Impact:** The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of "Potential Mineral Resource Significance" (MRZ-3). However, the project site flanks a residential area which is incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project will not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

**No Impact:** The project site is not located in an area that has MRZ-2 designated lands, nor is it located within 1,300 feet of such lands. Therefore, the proposed project would not result in the loss of availability of locally important mineral resource(s). Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan will occur as a result of this project.

**XII. NOISE** -- Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Potentially Significant Impact:** The project is a large residential subdivision and will involve major grading and construction activities. The surrounding area supports residential and open space land and the project may expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

**General Plan – Noise Element**

The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive area to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Moreover, if the project is in excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries or similar facilities as mentioned within Tables N-1 and N-2.

**Noise Ordinance – Section 36.404**

Non-transportation noise generated by the sewage treatment plant may exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the property lines. The proposed zoning and the location of the noise sources will be evaluated for compliance.

**Noise Ordinance – Section 36.409**

Construction noise may exceed the standards of the County of San Diego Noise Ordinance (Section 36.409). Construction operations would be expected to occur during permitted hours of operation pursuant to Section 36.409, but areas of blasting may be required and an evaluation of construction equipment noise that may be in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM must be done.

To determine conformance, a Noise Analysis must be completed for the project and must be discussed in the EIR.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

**No Impact:** The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
2. Residences and buildings where people normally sleep including hotels, hospitals, and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation     | <input type="checkbox"/> No Impact                    |



Incorporated

**Potentially Significant Impact:** The project site is adjacent to Country Club Drive and may be impacted by noise from this Circulation Element roadway. In addition, the project proposes a wastewater treatment plant, which may have potential noise generation impacts.

Policy 4b of the Noise Element of the General Plan specifies that "whenever it appears that new development will result in any (existing or future) noise sensitive area being subjected to noise levels of CNEL equal to 60 decibels or greater, an acoustical study should be required". The Noise Element defines "noise sensitive area" as "the building site of any residence, hospital, school, library, or similar facility where quiet is an important attribute of the environment." To determine conformance a Noise Analysis must be completed for the project and must be discussed in the EIR.

- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation	<input type="checkbox"/> No Impact
<input type="checkbox"/> Incorporated	

**Potentially Significant Impact:** Although construction operations will occur only during permitted hours of operation, potential impacts may occur if construction noise limits of the County of San Diego Noise Ordinance (Section 36.409), are exceeded. The facility also supports noise generating equipment required for the sewage treatment plant. To determine conformance, a Noise Analysis must be completed for the project and must be discussed in the EIR.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation	<input checked="" type="checkbox"/> No Impact
<input type="checkbox"/> Incorporated	

**No Impact:** The northern third of the project site is located within the "Airport Influence Area 2" for the McClellan-Palomar Airport which is 8.4 miles west. This designation does not place any limitations on proposed residential uses and would not expose people residing or working in the project area to excessive noise levels.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation	<input checked="" type="checkbox"/> No Impact
<input type="checkbox"/> Incorporated	

**No Impact:** The proposed project is not located within a one-mile vicinity of a private airstrip; therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

**XIII. POPULATION AND HOUSING** -- Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

☒ Potential Impact☐ No Impact

**Potential Impact:** Growth induction is a change in physical circumstance or regulatory issues that would remove a restriction to or encourage an increase in human population or development. A project can be determined to have a growth-inducing impact if it directly or indirectly causes economic or population expansion through the removal of obstacles to growth, actions that are sometimes referred to as "growth accommodating."

Growth is not considered positive or negative in itself, but is an element of the project that must be analyzed through the physical environmental changes it causes. The proposed project includes the following aspects which may be determined to be growth inducing: whether approval of the proposed general plan amendment requires additional upgrades in land use regulatory plans such as the Mobility Element; whether approval of the project requires major improvements to road circulation, extension of water, gas, and electric lines, or installation and operation of a new sewage treatment facility with capacity to serve additional properties. Growth induction can result in a wide variety of potential impacts, which must be discussed in the context of the EIR.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

☐ Potentially Significant Impact  
☐ Less Than Significant With Mitigation Incorporated

☒ Less than Significant Impact  
☐ No Impact

**Less Than Significant Impact:** The property currently has one occupied home, which, even though it would be demolished, would be replaced by the proposed housing development. Potentially a total of 362 single-family dwellings will exist when the lots are developed.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

☐ Potentially Significant Impact  
☐ Less Than Significant With Mitigation Incorporated

☒ Less than Significant Impact  
☐ No Impact

The property currently has one occupied home, which will be demolished when the project is implemented. This residential development would not displace substantial numbers of people associated with the existing structures. Potentially a total of 362 single-family dwellings will exist when the lots are developed. Therefore, the proposed project will not displace a substantial number of people

**XIV. PUBLIC SERVICES**

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or

other performance service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** The project proposes to receive water service from the Rincon del Diablo Municipal Water District. Facilities to serve the project are reasonably expected to be available within the next five years based on the capital facility plan of the district.

The project proposes to annex to the County Sanitation District for operation and maintenance of the proposed wastewater treatment facility. The project is required to provide an infrastructure study, as well as a policy analysis to determine the feasibility of the proposal for sewer service.

The project is located within the Escondido Union School District and the Escondido Union High School District and it is eligible for service. Impacts to school facilities will be avoided by the payment of fees pursuant to State Law prior to the issuance of Building Permits.

The Sheriff's office reviewed the project and determined that based on the currently accepted standard 1 patrol position per 10,000 population, or 0.53 sworn officers per 1,000 people, and the current census figures of 2.79 residents per household in the County, this project would require the assignment of 0.5 additional officers. The San Marcos Station has adequate space to absorb this additional staff and no new facilities or expansion of facilities would be needed as a result of this development.

The sewer service annexation and the ability of the districts to serve the project must be evaluated in the EIR and be adequate for the Local Agency Formation Commission (LAFCO) and the serving districts to use for their environmental determinations. The physical environmental changes that would result from extending service to the project site may result in significant impacts and in growth. As a result, relevant technical analyses for the provision of public services will be presented in the context of the EIR.

#### **XV. RECREATION**

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** The project involves a residential subdivision that will increase the use of existing neighborhood and regional parks or other recreational facilities. To avoid substantial physical deterioration of local recreation facilities the project will be required to pay fees or dedicate land for local parks to the County pursuant to the Park Land Dedication

Ordinance (PLDO). The Park Land Dedication Ordinance (PLDO) is the mechanism that enables the funding or dedication of local parkland in the County. The PLDO establishes several methods by which developers may satisfy their park requirements. Options include the payment of park fees, the dedication of a public park, the provision of private recreational facilities, or a combination of these methods. PLDO funds must be used for the acquisition, planning, and development of local parkland and recreation facilities. Local parks are intended to serve the recreational needs of the communities in which they are located. The project is currently proposing an equestrian staging area and public trails that may be eligible for partial participation, but no public parks. The EIR will include an evaluation of the local and regional parks' ability to meet current and future needs of the project and the vicinity.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** The project includes a private community center, pocket open space, and public trails and with an equestrian staging area. However, as outlined in this Environmental Analysis Form, the new facilities will be evaluated in the EIR.

**XVI. TRANSPORTATION AND TRAFFIC** -- Would the project:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Potentially Significant Impact:** The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee Program and the Congestion Management Program.

The proposed project is calculated to generate 4,430 ADT, with a total of 354 trips during the AM peak hour (106 inbound/248 outbound trips) and 443 total trips during PM peak hour (310 inbound/133 outbound) and it may have impacts related to performance measures and measures of effectiveness of the circulation system, as adopted by the Mobility Element (August 2011). These trips will be distributed on Mobility Element roadways in the County some of which currently or are projected to operate at inadequate levels of service. Therefore, the project will have a direct impact related to a conflict with policies establishing measures of the effectiveness for the performance of the circulation system.

The preliminary traffic study identified that the project would not result in direct traffic impacts. However, based on future study and review, the project's added traffic may result in direct impacts to Country Club Drive. The traffic study identified significant cumulative traffic impacts to County roadway facilities and roadway facilities located within the Cities of Escondido and

San Marcos's jurisdictions. The project will also add traffic to Caltrans facilities located within the Cities of Escondido and San Marcos's jurisdictions that are projected to operate at LOS E/F in the cumulative scenario. Based on future study and review, the project's added traffic may result in additional traffic impacts.

The County of San Diego has developed an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County. However, the project is a General Plan Amendment and is not eligible to participate in the TIF program, which was created as a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from planned future development. TIF was based on SANDAG regional growth and land use forecasts as analyzed in the SANDAG Regional Transportation Model and projected to build-out (year 2030) development conditions on the existing Mobility Element roadway network throughout the unincorporated area of the County. Since the project increases the ADT that would occur in the future, the model does not accurately determine funding necessary to construct transportation facilities that will mitigate cumulative impacts from this new development. Cumulative traffic must be assessed separately and mitigated on a project specific basis. Payment of the TIF, required at issuance of building permits, may be a part of adequate mitigation, but analysis must demonstrate the adequacy of this mitigation in combination with other components of a mitigation program. As a result, the EIR and Traffic Analysis are required to analyze the impact of the traffic generated by the project on County, City, and State roads in the area.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Potentially Significant Impact:** The designated congestion management agency for the San Diego region is SANDAG. SANDAG is responsible for preparing the Regional Transportation Plan (RTP) of which the Congestion Management Program (CMP) is an element to monitor transportation system performance, develop programs to address near- and long-term congestion, and better integrate land use and transportation planning decisions. The CMP includes a requirement for enhanced CEQA review applicable to certain large developments that generate an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak hour vehicle trips. These large projects must complete a traffic analysis that identifies the project's impacts on CMP system roadways, their associated costs, and identify appropriate mitigation. Early project coordination with affected public agencies, the Metropolitan Transit System (MTS) and the North County Transit District (NCTD) is required to ensure that the impacts of new development on CMP transit performance measures are identified. The addition of the project's traffic may result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions. Therefore, the proposal could result in a potential degradation of the level of service standard established by the County congestion management agency for designated roads or highways. As a result the EIR and Traffic Analysis are required to analyze the impact of the traffic generated by the project on County & State roads in the area.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
---	---

- ☒ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Less Than Significant With Mitigation Incorporated:** The main compatibility concerns for the protection of airport airspace are related to airspace obstructions (building height, antennas, etc.) and hazards to flight (wildlife attractants, distracting lighting or glare, etc.). The proposed project is within the designated Airport Influence Area 2 (AIA 2) for McClellan-Palomar Airport, but is located outside of the safety zones and is 8.4 miles east of the airport. Therefore, the proposed project, while unlikely to be "potentially significant", may require "mitigation to avoid a significant impact" on air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. According to 14 Code of Federal Regulations, part 77 pursuant to 49 U.S.C., Section 44718, the FAA must make a determination if the residential land use action is a potential hazard. If the action is a potential hazard, the County would need to submit an application for a consistency determination from the RAA. The proposed residential land use in AIA 2 also requires an overflight notification for the airport. Airport hazards are also discussed in section VIII.e, Hazards and Hazardous Materials. Additional discussion related to these actions will occur in the context of the EIR.

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- ☒ Potentially Significant Impact ☐ Less than Significant Impact  
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Potentially Significant Impact:** The Traffic Analysis must demonstrate safe and adequate sight distance of driveways and intersections and propose improvements in accordance with County of San Diego Public and Private Road Standards. Depending of the extent and access of the proposed equestrian staging area, some accommodations may have to be made for entry by trailers. Operational and construction traffic must have analysis for traffic hazards and adequate sight distance. As a result the EIR and Traffic Analysis are required to analyze potential traffic hazards.

- e) Result in inadequate emergency access?

- ☒ Potentially Significant Impact ☐ Less than Significant Impact  
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Potentially Significant Impact:** A Fire Protection Plan (FPP) will be prepared for the proposed project. The San Marcos Fire Protection District, which is the Fire Authority Having Jurisdiction, and the San Diego County Fire Authority, must approve the proposed project and associated emergency access roadways to determine that access to the project does not exceed the maximum cumulative dead-end road length specified in the San Diego County Consolidated Fire Code. The fire station or stations serving the project also must meet County standards for emergency travel time to the site. The Fire Protection Plan is expected to identify mitigation measures or design features that will reduce potentially significant impacts. However, the issue must be discussed in the context of the EIR.

- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

- ☒ Potentially Significant Impact ☐ Less than Significant Impact

- ☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Potentially Significant Impact:** Project implementation will result in construction of road improvements that may interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project may generate travel demand for transit, pedestrian or bicycle facilities. Therefore, the project EIR must discuss compatibility with policies, plans, or programs regarding public transit, bicycle and pedestrian facilities.

**XVII. UTILITIES AND SERVICE SYSTEMS** -- Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

- ☒ Potentially Significant Impact ☐ Less than Significant Impact  
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Potentially Significant Impact:** The project proposes to utilize a new package sewage treatment system for effluent treatment/disposal. Processed and discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. Potential environmental impacts must be addressed within the appropriate technical studies and analyzed in the EIR.

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

- c) ☒ Potentially Significant Impact ☐ Less than Significant Impact  
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Potentially Significant Impact:** The project proposes to utilize a new package sewage treatment system for effluent treatment/disposal. Processed and discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. Potential environmental impacts must be addressed within the appropriate technical studies and analyzed in the EIR.

- d) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

- ☒ Potentially Significant Impact ☐ Less than Significant Impact  
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

**Potentially Significant Impact:** The project includes new stormwater drainage facilities. Moreover, the project involves landform modification including source treatment and structural Best Management Practices for stormwater. These new and/or expanded facilities may result in adverse physical effect on the environment. Potential environmental impacts must be addressed within the appropriate technical studies and analyzed in the EIR.

- e) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Potentially Significant Impact:** The proposed project site is included in the San Diego County Water Authority (SDCWA) boundary line. The site is within the Rincon del Diablo Municipal Water District (RdDMWD). A water service availability letter was received indicating that facilities to serve the project site are expected to be available within 5 years. It also indicates that pipelines will have to be extended and that the planned facilities will have to be completed. One of the planned facilities, a future potable and/or recycled water reservoir, would require extensive hydraulic analysis to determine the potable facility requirements to serve the project which may have home sites above the elevation of the reservoir site. Potential environmental impacts must be addressed within the appropriate technical studies and analyzed in the EIR.

- f) Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Potentially Significant Impact:** The project proposes to annex to the San Diego County Sanitation District and build a wastewater treatment facility, to provide wastewater treatment and reclamation service. The provision of adequate wastewater treatment facilities should be assured through a Sanitation Agreement entered into between the project applicants and the County of San Diego. However, the details of that agreement regarding adequate wastewater capacity must be identified and disclosed within the EIR and appropriate technical studies.

- g) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Less Than Significant Impact:** Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

- h) Comply with federal, state, and local statutes and regulations related to solid waste?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact



Incorporated

**Less than Significant Impact:** Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The project will deposit all solid waste at a permitted solid waste facility and will comply with Federal, State, and local statutes and regulations related to solid waste.

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE:**

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation	<input type="checkbox"/> No Impact

Incorporated

**Potentially Significant Impact:** Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. As a result of this evaluation, the project was determined to have potential significant effects related to Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Utilities and Service Systems. While mitigation has been proposed in some instances that reduce these effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear. Therefore, this project has been determined to potentially meet this Mandatory Finding of Significance.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation	<input type="checkbox"/> No Impact

Incorporated

**Potentially Significant Impact:** Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XVIII of this form. In addition to project specific impacts, this

evaluation considered the projects potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there were determined to be potentially significant cumulative effects related to Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Global Greenhouse Gases, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, and Utilities and Service Systems. While mitigation has been proposed in some instances that reduce these cumulative effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear. Therefore, this project has been determined to potentially meet this Mandatory Finding of Significance.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

**Potentially Significant Impact:** In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, VIII. Hazards and Hazardous Materials, IX Hydrology and Water Quality XII. Noise, XIII. Population and Housing, and XVI. Transportation and Traffic. As a result of this evaluation, there were determined to be potentially significant effects related to all of these. While mitigation has been proposed in some instances that reduce these significant effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear. Therefore, this project has been determined to potentially meet this Mandatory Finding of Significance.

## XIX. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation, refer to <http://www4.law.cornell.edu/uscode/>. For State regulation, refer to [www.leginfo.ca.gov](http://www.leginfo.ca.gov). For County regulation refer to [www.amlegal.com](http://www.amlegal.com). All other references are available upon request.

### AESTHETICS

California Street and Highways Code [California Street and Highways Code, Section 260-283.  
(<http://www.leginfo.ca.gov/>)

California Scenic Highway Program, California Streets and Highways Code, Section 260-283.  
(<http://www.dot.ca.gov/hq/LandArch/scenic/scpr.htm>)

County of San Diego, Department of Planning and Land Use. The Zoning Ordinance of San Diego County. Sections 5200-5299; 5700-5799; 5900-5910, 6322-6326.  
([www.co.san-diego.ca.us](http://www.co.san-diego.ca.us))

County of San Diego, Board Policy I-73: Hillside Development Policy. ([www.co.san-diego.ca.us](http://www.co.san-diego.ca.us))

County of San Diego, Board Policy I-104: Policy and Procedures for Preparation of Community Design Guidelines, Section 396.10 of the County Administrative Code and Section 5750 et seq. of the County Zoning Ordinance. ([www.co.san-diego.ca.us](http://www.co.san-diego.ca.us))

County of San Diego Light Pollution Code, Title 5, Division 9 (Sections 59.101-59.115 of the County Code of Regulatory Ordinances) as added by Ordinance No 6900, effective January 18, 1985, and amended July 17, 1986 by Ordinance No. 7155. ([www.amlegal.com](http://www.amlegal.com))

County of San Diego Wireless Communications Ordinance [San Diego County Code of Regulatory Ordinances.  
([www.amlegal.com](http://www.amlegal.com))

Design Review Guidelines for the Communities of San Diego County. (Alpine, Bonsall, Fallbrook, Julian, Lakeside, Ramona, Spring Valley, Sweetwater, Valley Center).

Federal Communications Commission, Telecommunications Act of 1996 [Telecommunications Act of 1996, Pub. LA. No. 104-104, 110 Stat. 56 (1996).  
(<http://www.fcc.gov/Reports/tcom1996.txt>)

Institution of Lighting Engineers, Guidance Notes for the Reduction of Light Pollution, Warwickshire, UK, 2000  
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International Light Inc., Light Measurement Handbook, 1997.  
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National Lighting Product Information Program (NLPPI),  
Lighting Answers, Volume 7, Issue 2, March 2003.  
([www.lrc.rpi.edu](http://www.lrc.rpi.edu))

US Census Bureau, Census 2000, Urbanized Area Outline  
Map, San Diego, CA.  
(<http://www.census.gov/geo/www/maps/ua2kmaps.htm>)

US Department of the Interior, Bureau of Land Management  
(BLM) modified Visual Management System.  
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EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

**Notice of Preparation**

June 20, 2013

To: Reviewing Agencies

Re: Valiano  
SCH# 2013061042

Attached for your review and comment is the Notice of Preparation (NOP) for the Valiano draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Beth Ehsan  
San Diego County  
5510 Overland Ave. Suite 110  
San Diego, CA 92123**

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2013061042  
**Project Title** Valiano  
**Lead Agency** San Diego County

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**Type** **NOP** Notice of Preparation  
**Description** The project would require a General Plan Amendment to change the designation to Semi-Rural 0.5 (SR-0.5). The site contains one home to be removed and a historic barn to remain. The property is currently zoned A70 with minimum lots sizes of 1 and 2 acres. A Rezone would be required to reduce the minimum lot size and change the A70 areas to RS. A Specific Plan and Site Plan would establish setbacks, etc, which will vary across the five proposed neighborhoods.

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**Lead Agency Contact**

**Name** Beth Ehsan  
**Agency** San Diego County  
**Phone** 858 694 3103 **Fax**  
**email**  
**Address** 5510 Overland Ave. Suite 110  
**City** San Diego **State** CA **Zip** 92123

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**Project Location**

**County** San Diego  
**City** San Marcos, Escondido  
**Region**  
**Cross Streets** Mount Whitney Road and Country Club Drive  
**Lat / Long** 33° 6' 57" N / 117° 8' 11" W  
**Parcel No.** 232-013-01 - 03, 232-020-55, 232-492-01, 232-500-18 - 23, 235-031-41  
**Township** 12S **Range** 2W **Section** 19 **Base** SBB&M

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**Proximity to:**

**Highways** Hwy 78, 15  
**Airports** No  
**Railways** Sprinter line  
**Waterways** Escondido Creek, San Marcos Creek  
**Schools** 14  
**Land Use** Semi-Rural Regional Category, Semi-Rural 1 (SR-1) and Semi-Rural 2 (SR-2) Land Use Designation, A70 Zoning

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**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

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**Reviewing Agencies** Resources Agency; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9

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**Date Received** 06/20/2013 **Start of Review** 06/20/2013 **End of Review** 07/19/2013



## Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

20113061042

### Project Title: Valiano

Lead Agency: County of San Diego, Planning & Development Services

Contact Person: Beth Ehsan

Mailing Address: 5510 Overland Ave. Suite 110

Phone: 858-694-3103

City: San Diego

Zip: 92123

County: San Diego

Project Location: County: San Diego

City/Nearest Community: San Marcos/Escondido/Eden Valley

Cross Streets: Mount Whitney Road and Country Club Drive

Zip Code: 92029

Lat. / Long.: 33° 6' 57" N/ 117° 8' 11" W

Total Acres: 209.3

Assessor's Parcel No.: 232-013-01 - 03, 232-020-55, 232-492-01, Section: 19 Twp.: 12S Range: 2W Base: SBB&M  
232-500-18 - 23, 235-031-41

Within 2 Miles: State Hwy #: 78, 15

Waterways: Escondido Creek, San Marcos Creek

Airports: none

Railways: Sprinter line

Schools: 14

### Document Type:

CEQA:

☒ NOP

☐ Early Cons

☐ Neg Dec

☐ Mit Neg Dec

☐ Draft EIR

☐ Supplement/Subsequent EIR  
(Prior SCH No.)

Other

NEPA:

☐ NOI

☐ EA

☐ Draft EIS

☐ FONSI

Other:

☐ Joint Document

☐ Final Document

☐ Other

### Local Action Type:

☐ General Plan Update

☒ General Plan Amendment

☐ General Plan Element

☐ Community Plan

☒ Specific Plan

☐ Master Plan

☐ Planned Unit Development

☒ Site Plan

☒ Rezone

☐ Prezone

☐ Use Permit

☒ Land Division (Subdivision, etc.)

☐ Annexation

☐ Redevelopment

☐ Coastal Permit

☐ Other

### Development Type:

☒ Residential: Units 362 Acres 209

☐ Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_

☐ Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_

☐ Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_

☐ Educational

☒ Recreational park, trails, equestrian staging area

☐ Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_

☐ Transportation: Type \_\_\_\_\_

☐ Mining: Mineral \_\_\_\_\_

☐ Power: Type \_\_\_\_\_ MW \_\_\_\_\_

☐ Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_

☐ Hazardous Waste: Type \_\_\_\_\_

☐ Other: \_\_\_\_\_

### Project Issues Discussed in Document:

☒ Aesthetic/Visual

☒ Agricultural Land

☒ Air Quality

☒ Archeological/Historical

☒ Biological Resources

☐ Coastal Zone

☒ Drainage/Absorption

☐ Economic/Jobs

☐ Other

☐ Fiscal

☒ Flood Plain/Flooding

☒ Forest Land/Fire Hazard

☒ Geologic/Seismic

☐ Minerals

☒ Noise

☒ Population/Housing Balance

☒ Public Services/Facilities

☒ Recreation/Parks

☐ Schools/Universities

☐ Septic Systems

☒ Sewer Capacity

☒ Soil Erosion/Compaction/Grading

☐ Solid Waste

☒ Toxic/Hazardous

☒ Traffic/Circulation

☒ Vegetation

☒ Water Quality

☐ Water Supply/Groundwater

☒ Wetland/Riparian

☒ Wildlife

☒ Growth Inducing

☒ Land Use

☒ Cumulative Effects

### Present Land Use/Zoning/General Plan Designation:

Semi-Rural Regional Category, Semi-Rural 1 (SR-1) and Semi-Rural 2 (SR-2) Land Use Designation, A70 Zoning

### Project Description: (please use a separate page if necessary)

The project would require a General Plan Amendment to change the designation to Semi-Rural 0.5 (SR-0.5). The site contains one home to be removed and a historic barn to remain. The property is currently zoned A70 with minimum lots sizes of 1 and 2 acres. A Rezone would be required to reduce the minimum lot size and change the A70 areas to RS. A Specific Plan and Site Plan would establish setbacks, etc, which will vary across the five proposed neighborhoods.

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".  
If you have already sent your document to the agency please denote that with an "S".

<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> Office of Emergency Services
<input type="checkbox"/> Boating & Waterways, Department of	<input type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Office of Public School Construction
<input type="checkbox"/> CalFire	<input type="checkbox"/> Parks & Recreation
<input type="checkbox"/> Caltrans District # _____	<input type="checkbox"/> Pesticide Regulation, Department of
<input type="checkbox"/> Caltrans Division of Aeronautics	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Planning (Headquarters)	<input type="checkbox"/> Regional WQCB # _____
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Coachella Valley Mountains Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Commission
<input type="checkbox"/> Coastal Commission	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers and Mtns Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mountains Conservancy
<input type="checkbox"/> Corrections, Department of	<input type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input checked="" type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> Fish & Game Region # 5 _____	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> General Services, Department of	<input type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> Health Services, Department of	<input type="checkbox"/> Other _____
<input type="checkbox"/> Housing & Community Development	<input type="checkbox"/> Other _____
<input type="checkbox"/> Integrated Waste Management Board	
<input type="checkbox"/> Native American Heritage Commission	

### Local Public Review Period (to be filled in by lead agency)

Starting Date June 20, 2013 Ending Date July 19, 2013

### Lead Agency (Complete if applicable):

Consulting Firm: _____	Applicant: _____
Address: _____	Address: _____
City/State/Zip: _____	City/State/Zip: _____
Contact: _____	Phone: _____
Phone: _____	

Signature of Lead Agency Representative: Beth Elson Date: 6/17/13

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

## NOP Distribution List

## Resources Agency

## Resources Agency

Nadell Gayou

## Dept. of Boating &amp; Waterways

Nicole Wong

## California Coastal Commission

Elizabeth A. Fuchs

## Colorado River Board

Gerald R. Zimmerman

## Dept. of Conservation

Elizabeth Carpenter

## California Energy Commission

Eric Knight

## Cal Fire

Dan Foster

## Central Valley Flood Protection Board

James Herola

## Office of Historic Preservation

Ron Parsons

## Dept of Parks &amp; Recreation

Environmental Stewardship Section

## California Department of Resources, Recycling &amp; Recovery

Sue O'Leary

## S.F. Bay Conservation &amp; Dev't. Comm.

Steve McAdam

## Dept. of Water Resources

Agency

Nadell Gayou

## Fish and Game

## Dept. of Fish &amp; Wildlife

Scott Flint

Environmental Services Division

## Fish &amp; Wildlife Region 1

Donald Koch

## Fish &amp; Wildlife Region 1E

Laurie Harnsberger

## Fish &amp; Wildlife Region 2

Jeff Drongesen

## Fish &amp; Wildlife Region 3

Charles Armor

## Fish &amp; Wildlife Region 4

Julie Vance

## Fish &amp; Wildlife Region 5

Leslie Newton-Reed

Habitat Conservation Program

## Fish &amp; Wildlife Region 6

Gabrina Gatchel

Habitat Conservation Program

## Fish &amp; Wildlife Region 6 I/M

Brad Henderson

Inyo/Mono, Habitat Conservation Program

## Dept. of Fish &amp; Wildlife M

George Isaac

Marine Region

## Other Departments

## Food &amp; Agriculture

Sandra Schubert

Dept. of Food and Agriculture

## Dept. of General Services

Public School Construction

## Dept. of General Services

Anna Garbelf

Environmental Services Section

## Dept. of Public Health

Jeffery Worth

Dept. of Health/Drinking Water

## Delta Stewardship Council

Kevan Samsam

## Independent Commissions/Boards

## Delta Protection Commission

Michael Machado

## Cal EMA (Emergency Management Agency)

## Native American Heritage Comm.

Debbie Treadway

## Public Utilities Commission

Leo Wong

## Santa Monica Bay Restoration

Guangyu Wang

## State Lands Commission

Jennifer Deleong

## Tahoe Regional Planning Agency (TRPA)

Cherry Jacques

## Business, Trans &amp; Housing

## Caltrans - Division of Aeronautics

Philip Crimmins

## Caltrans - Planning

Terri Pencovic

## California Highway Patrol

Suzann Ikeuchi

Office of Special Projects

## Housing &amp; Community Development

CEQA Coordinator

Housing Policy Division

## Dept. of Transportation

## Caltrans, District 1

Rex Jackman

## Caltrans, District 2

Marcelino Gonzalez

## Caltrans, District 3

Gary Arnold

## Caltrans, District 4

Erik Alm

## Caltrans, District 5

David Murray

## Caltrans, District 6

Michael Navarro

## Caltrans, District 7

Dianna Watson

## Caltrans, District 8

Dan Kopulsky

## Caltrans, District 9

Gayle Rosander

## Caltrans, District 10

Tom Dumas

## Caltrans, District 11

Jacob Armstrong

## Caltrans, District 12

Marlon Regisford

## Cal EPA

## Air Resources Board

## Airport/Energy Projects

Jim Lerner

## Transportation Projects

Douglas Ito

## Industrial Projects

Mike Tollstrup

## State Water Resources Control Board

Regional Programs Unit

Division of Financial Assistance

## State Water Resources Control Board

Student Intern, 401 Water Quality Certification Unit

Division of Water Quality

## State Water Resources Control Board

Phil Crader

Division of Water Rights

## Dept. of Toxic Substances Control

CEQA Tracking Center

## Department of Pesticide Regulation

CEQA Coordinator

## RWQCB 1

Cathleen Hudson

North Coast Region (1)

## RWQCB 2

Environmental Document Coordinator

San Francisco Bay Region (2)

## RWQCB 3

Central Coast Region (3)

## RWQCB 4

Teresa Rodgers

Los Angeles Region (4)

## RWQCB 5S

Central Valley Region (5)

## RWQCB 5F

Central Valley Region (5)

Fresno Branch Office

## RWQCB 5R

Central Valley Region (5)

Redding Branch Office

## RWQCB 6

Lahontan Region (6)

Lahontan Branch Office

## RWQCB 6V

Lahontan Region (6)

Victorville Branch Office

## RWQCB 7

Colorado River Basin Region (7)

## RWQCB 8

Santa Ana Region (8)

## RWQCB 9

San Diego Region (9)

## Other

Conservancy

**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Boulevard  
West Sacramento, CA 95691  
(916) 373-3715  
(916) 373-5471 – FAX  
e-mail: ds\_nahc@pacbell.net

June 26, 2013

Ms. Beth Ehsan, Project Planner

**County of San Diego Department of Planning and  
Development Services**

5510 Overland Avenue, Suite 110  
SAN DIEGO, CA 92123

RE: SCH# 2013061042 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **"Valiano Project; (to REOne to RS, reducing lot size)"** located in the San Marcos-Escondido-Eden valley areas; San Diego County, California

Dear Ms. Ehsan:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3<sup>rd</sup> 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required: This project is also subject to California Government Code Section 65352.3, *et seq.*

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this

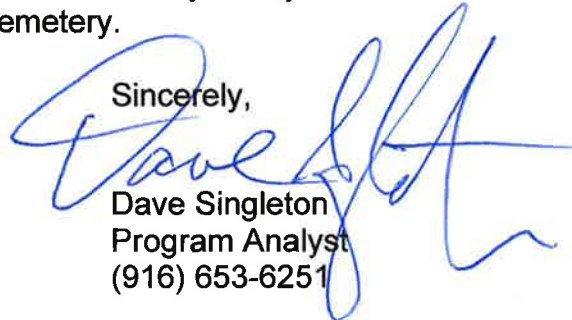
be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

Contact has been made to the Native American Heritage Commission for a Sacred Lands File Check. A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed activity might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.

Also, CEQA Guidelines Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,



Dave Singleton  
Program Analyst  
(916) 653-6251

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts  
San Diego County  
June 26, 2013**

Pala Band of Mission Indians  
Historic Preservation Office/Shasta Gaughen  
35008 Pala Temecula Road, Luiseno  
Pala, CA 92059 Cupeno  
PMB 50  
(760) 891-3515  
sgaughen@palatribe.com  
(760) 742-3189 Fax

Pauma & Yuima Reservation  
Randall Majel, Chairperson  
P.O. Box 369 Luiseno  
Pauma Valley CA 92061  
paumareservation@aol.com  
(760) 742-1289  
(760) 742-3422 Fax

Pechanga Band of Mission Indians  
Paul Macarro, Cultural Resources Manager  
P.O. Box 1477 Luiseno  
Temecula, CA 92593  
**(951) 770-8100**  
pmacarro@pechanga-nsn.  
gov  
(951) 506-9491 Fax

Rincon Band of Mission Indians  
Vincent Whipple, Tribal Historic Preservation Officer  
1 West Tribal Road Luiseno  
Valley Center, CA 92082  
jmurphy@rincontribe.org  
(760) 297-2635  
(760) 297-2639 Fax

Pauma Valley Band of Luiseño Indians  
Bennae Calac  
P.O. Box 369 Luiseno  
Pauma Valley CA 92061  
**bennaecalac@aol.com**  
(760) 617-2872  
(760) 742-3422 - FAX

Rincon Band of Mission Indians  
Bo Mazzetti, Chairperson  
1 West Tribal Road Luiseno  
Valley Center, CA 92082  
bomazzetti@aol.com  
(760) 749-1051  
(760) 749-8901 Fax

San Luis Rey Band of Mission Indians  
Cultural Department  
1889 Sunset Drive Luiseno  
Vista, CA 92081 Cupeno  
760-724-8505  
  
760-724-2172 - fax

La Jolla Band of Mission Indians  
Lavorne Peck, Chairwoman  
22000 Highway 76 Luiseno  
Pauma Valley CA 92061  
rob.roy@lajolla-nsn.gov  
(760) 742-3796  
(760) 742-1704 Fax

**This list is current only as of the date of this document.**

**Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

his list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013061042; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Vallano Project; located in portions of the cities of San Marcos and Escondido and the Eden Valley; San Diego County, California.

**PALA TRIBAL HISTORIC  
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road  
Pala, CA 92059

760-891-3510 Office | 760-742-3189 Fax



PALA THPO

July 17, 2013

Beth Ehsan, Project Manager  
County of San Diego Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123

RE: Notice of Preparation of an EIR, PDS2013-SP-13-001, Log No. ER-13-18-002; Valiano

Dear Ms. Ehsan,

Our office is in receipt of the Notice of Preparation for the project referenced above. This letter constitutes our initial response on behalf of Robert Smith, Chairman of the Pala Band of Mission Indians.

The project as described sits on the boundary of the area that the Pala Band considers to be part of its Traditional Use Area. Ordinarily we would defer comment to tribes in closer proximity to the project. However, because the CEQA Initial Study included in the Notice finds that there may be Potentially Significant Impacts to cultural resources and that a number of archaeological resources have been identified within a mile radius of the site, we felt it was important to comment at this time.

We would like the County to include Native American participation – specifically, tribal monitors – in any and all surveys and site visits to assess impacts to cultural areas. We would also like the opportunity to comment on any surveys and reports generated for this project before the release of the draft EIS. In this way, we can make sure that communication occurs early and often in the process and that the environmental documents have already taken our concerns and suggestions into consideration. Early and full cooperation will ensure that there are no misunderstandings as the project moves forward, such as occurred on other nearby projects such as Meadowood. I am happy to help you identify qualified individuals to participate as tribal monitors and to continue to consult with you as the project moves forward.

Please feel free to contact me with any questions or concerns at [sgaughen@palatribe.com](mailto:sgaughen@palatribe.com).

Sincerely,

Shasta C. Gaughen, PhD  
Tribal Historic Preservation Officer



**SAN PASQUAL BAND OF DIEGUEÑO MISSION INDIANS OF CALIFORNIA**  
**SAN PASQUAL RESERVATION**

TRIBAL COUNCIL

July 8, 2013

Allen E. Lawson  
Chairman

Victoria Diaz  
Vice-Chairman

Tilda Green  
Secretary-  
Treasurer

David L. Toler  
Delegate

Steven Cope  
Delegate

County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Dear Sir:

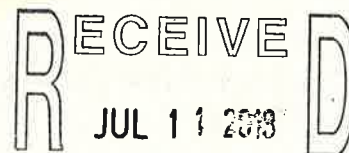
Subject: Project name: Valiano

After review of your Notice of Preparation of Environmental Impact Report we feel as if this project as proposed is overly aggressive and will have an adverse effect on the already depleted biological and native cultural sites of this region. A development of this scale is out of place.

This area is considered Ipai-Kumeyaay ancestral territory and our band has the responsibility to express ourselves when there is a proposal that has significant impact on the terrain.

Sincerely,

David L. Toler  
Delegate



Planning and  
Development Services





REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
**LOS ANGELES DISTRICT CORPS OF ENGINEERS**  
**REGULATORY DIVISION, SOUTH COAST branch**  
**CARLSBAD FIELD OFFICE**  
**5900 LA PLACE COURT, SUITE 100**  
**CARLSBAD, CALIFORNIA 92008**

FED

July 11, 2013

Regulatory Division

Ms. Beth Ehsan, Project Manager  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123-1239

Dear Ms. Ehsan:

This letter is in response to your request, dated June 20, 2013, for our review and comments regarding the Notice of Preparation of an Environmental Impact Report for the Valiano Residential Development project (Log No. ER-13-08-002) located in the Eden Valley area of the San Dieguito Planning Community Area, between the cities of San Marcos and Escondido within unincorporated San Diego County, California (Corps File Number SPL-2013-00455-MBS).

We have reviewed the above cited project information with respect to the Army Corps of Engineers' (Corps) authority to issue Department of the Army (DA) permits pursuant to section 10 of the Rivers and Harbors Act (33 U.S.C. 403) and section 404 of the Clean Water Act (33 U.S.C. 1344). It appears potential waters of the U.S. are present within the project area. The Corps recommends that the proposed project be designed to first avoid, and then minimize impacts to waters of the U.S. to the maximum extent practicable. Please note that a DA permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material other than incidental fallback within, "waters of the United States", including wetlands and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to the following activities:

- a. Creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;
- b. Mechanized land clearing and grading which involve filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the U.S.;
- c. Allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the U.S.; and

d. Placing pilings when such placement has or would have the effect of a discharge of fill material.

An application for a DA permit is available on our website:  
<http://www.usace.army.mil/Portals/2/docs/civilworks/permitapplication.pdf>. If you have any questions, please contact me at 760-602-4836 or via e-mail at Meris.Bantilan-Smith@usace.army.mil. Please refer to this letter and SPL-2013-00455-MBS in your reply.

***“Building Strong and Taking Care of People”***

Sincerely,



Meris Bantilan-Smith  
Senior Project Manager  
South Coast Branch



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

EDMUND G. I  
CHARLTON

STATE

July 18, 2013

Ms. Beth Ehsan  
Department of Planning and Land Use, County of San Diego  
5510 Overland Ave. Suite 110  
San Diego, CA 92123  
beth.ehsan@sdcounty.ca.gov

**Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Valiano Project, County of San Diego, CA (SCH# 2013061042)**

Dear Ms. Ehsan:

The California Department of Fish and Wildlife (Department) has reviewed the Notice of Preparation (NOP) for the Valiano Project draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program (DFG Code Section 2800, et. seq.). The County of San Diego (County) participates in the NCCP program by implementing the County's Multiple Species Conservation Program (MSCP). The proposed project is located within the boundaries of the draft North County MSCP Subarea Plan (SAP) within the County in California.

The proposed project includes 12 parcels (209.3 acres) located north of Mount Whitney Road and west of Country Club/Harmony Grove Drive in the Eden Valley portion of the San Dieguito Community Planning Area of unincorporated San Diego County. The project consists of a private gated residential development of 362 residential lots, 17 open space lots, and easements of 109 acres, with preservation of both agriculture and native habitats. Proposed minimum lot size ranges from 4,500 square feet in Neighborhood 1 to 7,000 square feet in Neighborhoods 2 and 3. Typical surrounding lot sizes are 2 to 4 acres to the west and 1 acre to the east. To the northeast are mobile home parks and to the north across La Moree are 5,000 square foot lots. To the south is the Harmony Grove Village Specific Plan, Planning Area 3, which is planned for a density of just over one dwelling unit per acre and lot sizes of approximately one-half acre. The Village boundary is located about one-quarter mile south of nearby neighborhoods, and adjoins the southwestern edge of another neighborhood. As proposed, the project site would be accessed from Hill Valley Drive, Mount Whitney Road, and Country Club Drive. Consequently, offsite improvements on Country Club Drive may be required. Proposed grading is 700,000 cubic yards of balanced cut and fill (average 3,500 cubic yards per acre). The project would also include public multi-use trails, smaller private trails, an equestrian staging area and park land. Water service would be provided by the Rincon del Diablo Municipal Water District; the preferred option for sewer service is a wastewater treatment plant operated by the County Sanitation District. If the Vallecitos Municipal Water District sewer

option is selected, an offsite sewer line extension would be required. The proposed fire service provider is the San Marcos Fire Protection District.

The Department offers the following comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating project related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts.

### **Specific Comments**

1. Habitat, including coastal sage scrub (CSS), will likely be impacted by the project. Therefore, the DEIR should discuss how loss of coastal sage scrub will be mitigated. If impacts to CSS are proposed, the County would need to issue a habitat loss permit (HLP) for the project. Wildlife Agency (U.S. Fish and Wildlife Service [Service] and Department) are required to review and approve HLPs. For projects requiring HLPs, we recommend that mitigation for CSS occur in the same planning unit (Harmony Grove) as the proposed impacts. The DEIR should recommend the appropriate steps to initiate the process for acquiring a 4 (d) interim Habitat Loss Permit from the Wildlife Agencies for any impacts to CSS. Projects that result in impacts to sensitive habitat should also provide adequate mitigation following the North County draft SAP and ensure adequate funding for long term management of the mitigation site.
2. The project site is located north and/or adjacent to the Harmony Grove development project, which was recently approved by the County (and required a HLP) and is currently under construction. The Harmony Grove development project includes on-site as well as off-site mitigation locations for upland and wetland impacts from that project. In some areas, the proposed Valiano project would be located immediately adjacent or in proximity to on-site mitigation areas for the Harmony Grove development project. The DEIR should analyze and demonstrate that the proposed Valiano development project would not result in any direct or indirect impacts to the mitigation areas located on the adjacent Harmony Grove development project.
3. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants and wildlife, we recommend the DEIR include a complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas. The DEIR should include any analysis of impacts to biological resources from any required services (e.g., fire, sewer, water, drainage, etc.) that would be required for the project. All areas on- and off-site needed for fuel clearing and fire access, water purveyance, sewerage treatment (including any secondary or tertiary leach field or spreading areas), and drainage should avoid/minimize impacts to biological resources to the extent practicable. Impacts associated with these services should be contained within the development footprint. Where impacts from construction, and operation and maintenance of these services/facilities are unavoidable, then appropriate mitigation should be identified in the DEIR. As indicated above, we recommend that all biological impacts from the project be mitigated within the same North County MSCP planning unit as the proposed project (No.11, Harmony Grove). The intent is to identify all potential immediate and long-term impacts related to providing fire access and other necessary services for the project upfront, so areas identified for

mitigation/open space are not later subject to additional impacts from required project services.

4. It is also the policy of the Department to strongly emphasize avoidance and minimization of impacts to jurisdictional wetland resources, including the conversion of wetlands to uplands. Where unavoidable impacts to wetlands are proposed, the Department requires a "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Based on review of information provided with the NOP, it appears that the project site may support aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be prepared and the results summarized and included in the DEIR. The delineation should be conducted pursuant to the Service wetland definition adopted by the Department.<sup>1</sup> Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers. The DEIR should fully analyze all potential direct and indirect impacts to wetland resources, including the identification of feasible mitigation measures to adequately compensate for any unavoidable impacts. Where mature riparian areas and/or movement corridors are proposed to be impacted, the mitigation identified in the DEIR must compensate for the loss of function and value of that which is impacted. Replacing the functions and values of mature riparian areas typically can take a substantial amount of time and resources; therefore, we recommend that these areas be avoided with a minimum 100-foot buffer, unless it is clearly demonstrated that there is no other feasible alternative.
5. The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the County's Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.<sup>2</sup>

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<sup>1</sup> Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

<sup>2</sup> A notification package for a LSA may be obtained by accessing the Department's web site at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600).

6. The DEIR should fully discuss the project's consistency with existing regional conservation planning efforts within the project area. These existing efforts include the North County MSCP draft SAP which is located within planning unit 11 (Harmony Grove) in the County. The Department recommends that any proposal to change, expand or develop new or more intense uses in the project area be evaluated for consistency with the conservation planning efforts that occur in the project area. For example, proposed development on this and other properties within the planning area may have a direct/indirect and/or cumulative effect on sensitive species, habitats, and wildlife movement.
  7. The Department recommends the DEIR include a range of feasible alternatives (including the placement of buildings and landscaping) to ensure that alternatives to the proposed project are fully considered and evaluated and the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.
  8. Native plants (endemic to the local area) should be used to the greatest extent feasible in landscaped areas adjacent to and/or near mitigation/open space areas and/or wetland/riparian areas. The applicant should not plant, seed, or otherwise introduce invasive exotic plant species to landscaped areas adjacent and /or near native habitat areas. The California Invasive Plant Council provides a list of exotic plants species (Invasive Plant Inventory [Cal-IPC; <http://www.cal-ipc.org/>]), which should be avoided in landscaped areas, included, but not limited to: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, and French broom.
  9. It is anticipated that the proposed project would result in increased traffic volumes on highways and roads adjacent to the proposed project area. The DEIR should discuss any direct and indirect impacts associated with the need to construct and maintain any road improvements required to off-set increased traffic volumes resulting from the proposed project. As part of the analysis, the DEIR should identify any on- and/or off-site impacts to sensitive species or habitats (including wetlands/vernal pools) that would result from any proposed road improvements associated with the project.
  10. The proposed project would create a significant amount of earthwork/grading and other ground disturbances. The DEIR should analyze the impacts that the project will have on storm water quality and general hydrology in the surrounding area. The DEIR should analyze the efficacy of Low Impact Development options to minimize storm water impacts including: site layout with regard to sensitive resources and off-site native habitat; and the use of pervious surfaces (crushed aggregate, turf block, unit pavers, pervious concrete and asphalt) as alternatives to impervious surfaces.
-

#### General Comments

1. The Department considers adverse impacts to a species protected by the CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085.) Consequently, if the project, project construction, or any project-related activity during the life of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

#### Biological Resources within the Project's Area of Potential Effect

2. The DEIR should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. The DEIR should include the following information.
  - a. Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis should be placed on resources that are rare or unique to the region.
  - b. A thorough assessment of rare plants and rare natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see: <http://www.wildlife.ca.gov/habcon/plant/>) (hard copy available on request).
  - c. A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 322-2493 or [www.wildlife.ca.gov/biogeodata/](http://www.wildlife.ca.gov/biogeodata/) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
  - d. An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, §15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted

at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Service and the Department.

#### Analyses of the Potential Project-Related Impacts on the Biological Resources

3. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.
  - a. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
  - b. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
  - c. A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

#### Mitigation for the Project-related Biological Impacts

4. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
5. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
6. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their



active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs.

Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

7. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
8. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on the referenced NOP for the County. Questions regarding this letter and further coordination on these issues should be directed to Bryand Duke at (858) 637-5511, [Bryand.Duke@wildlife.ca.gov](mailto:Bryand.Duke@wildlife.ca.gov) or Randy Rodriguez at (858) 467-4201, [Randy.Rodriguez@wildlife.ca.gov](mailto:Randy.Rodriguez@wildlife.ca.gov).

Sincerely,



Betty Courtney  
Environmental Program Manager  
South Coast Region

cc: Michael Moreno, U.S. Fish and Wildlife Service  
Scott Morgan, State Clearinghouse  
Gail Sevens, CDFW  
David Mayer, CDFW

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST, M.S. 240

SAN DIEGO, CA 92110

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July 8, 2013

11-SD-78  
PM 15.48  
Valiano NOP  
SCH 2013061042Ms. Beth Ehsan  
County of San Diego Planning  
5510 Overland Ave. Suite 110  
San Diego, CA 92123

Dear Ms. Ehsan:

The California Department of Transportation (Caltrans) has reviewed the Notice of Preparation (NOP) for the Valiano project near State Route 78 (SR-78). Caltrans has the following comments:

**Traffic Study**

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures. The study should use as a guideline the *Caltrans Guide for the Preparation of Traffic Impact Studies*. Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide.

The Level of Service (LOS) for operating State highway facilities is based upon Measures of Effectiveness (MOE) identified in the Highway Capacity Manual (HCM). Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" on State highway facilities; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than this target LOS, the existing MOE should be maintained. In general, the region-wide goal for an acceptable LOS on all freeways, roadway segments, and intersections is "D". For undeveloped or not densely developed locations, the goal may be to achieve LOS "C".

All State-owned signalized intersections affected by this project should be analyzed using the intersecting lane vehicle (ILV) procedure from the Caltrans Highway Design Manual, Topic 406, page 400-21.

The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.

A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacities. A focused analysis may also be necessary if there is an increased risk of a potential traffic accident.

All freeway entrance and exit ramps where a proposed project will add a significant number of peak-hour trips that may cause any traffic queues to exceed storage capacities should be analyzed. If ramp metering is to occur, a ramp queue analysis for all nearby Caltrans metered on-ramps is required to identify the delay to motorists using the on-ramps and the storage necessary to accommodate the queuing. The effects of ramp metering should be analyzed in the traffic study. For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

The data used in the TIS should not be more than 2 years old.

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

The lead agency should monitor impacts to insure that roadway segments and intersections remain at an acceptable LOS. Should the LOS reach unacceptable levels, the lead agency should delay the issuance of building permits for any project until the appropriate impact mitigation is implemented.

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

If you have any questions, please contact Roger Sanchez-Rangel of the Development Review branch at (619) 688-6494.

Sincerely,



JACOB ARMSTRONG, Branch Chief  
Development Review Branch

**Ehsan, Beth**

LOCAL

**From:** Barbara Redlitz <Bredlitz@ci.escondido.ca.us>  
**Sent:** Tuesday, July 30, 2013 3:00 PM  
**To:** Ehsan, Beth  
**Cc:** Ed Domingue; Jay Petrek; Paul Keck  
**Subject:** RE: County Referral - Valiano

Hi Beth,

Thanks for the quick response. In the interest of time, I am forwarding our brief comments via this email.

1. The project is inconsistent with the Estate I land use designation of the City's General Plan, yet it proposes densities typical of an urban development with full services. Since all of the project is within the City of Escondido's General Plan area, and the northern portion is within the Escondido Sphere of Influence, the EIR should include analysis of the Escondido General Plan policies, particularly regarding land use and circulation. The document should clarify whether an amendment to the Escondido Sphere of Influence (SOI) to detach the property from the City's SOI is included as part of the requested actions along with analysis of such an amendment.
2. The project proposes a package plant for wastewater treatment. Such facilities are difficult and costly to maintain. The City is concerned that the maintenance obligations will result in a future request for connection to City services for development that exceeds the anticipated densities under the City's recently adopted General Plan; any such connection would require costly improvements and upgrades to the City's facilities and collection system. The project should include adequate and enforceable measures for the ongoing management and funding of these maintenance responsibilities in perpetuity.
3. The project will introduce additional traffic affecting the City's circulation system. The traffic analysis should evaluate impacts to the City's circulation system pursuant to the City's Environmental Quality Regulations: <http://www.escondido.org/planning.aspx>

Thank you for the opportunity to review the NOP. We look forward to receiving a copy of the Draft EIR when available.

Regards,

Barbara J. Redlitz, AICP  
Director of Community Development  
201 North Broadway  
Escondido, CA 92025  
(760) 839-4546 phone  
(760) 839-4313 fax

[bredlitz@escondido.org](mailto:bredlitz@escondido.org)

---

**From:** Ehsan, Beth [<mailto:Beth.Ehsan@sdcounty.ca.gov>]  
**Sent:** Monday, July 29, 2013 2:19 PM  
**To:** Barbara Redlitz  
**Subject:** RE: County Referral - Valiano

Hi Barbara,

Attached is the Tentative Map. The location map is on our website at <http://www.sdcounty.ca.gov/pds/ceqa/SP-13-001.html>.

Note that the comment period ended on July 19<sup>th</sup> and we are reading through the comments now, so please get your comments in as soon as you can.

Thanks,  
Beth

---

**From:** Barbara Redlitz [<mailto:Bredlitz@ci.escondido.ca.us>]  
**Sent:** Monday, July 29, 2013 11:14 AM  
**To:** Ehsan, Beth  
**Subject:** County Referral - Valiano

Hi Beth,

We received a copy of the NOP for this project. Can you please forward a location map and copy of the tentative map?

Thank you.

Barbara J. Redlitz, AICP  
Director of Community Development  
201 North Broadway  
Escondido, CA 92025  
(760) 839-4546 phone  
(760) 839-4313 fax

[bredlitz@escondido.org](mailto:bredlitz@escondido.org)



## VALLECITOS WATER DISTRICT

A PUBLIC AGENCY

201 Vallecitos de Oro • San Marcos, California • 92069-1453 Telephone (760) 744-0460

June 26, 2013

Beth Ehsan  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123

**RE: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT (EIR)  
PDS2013-SP-13-001, LOG NO. ER-13-08-002; VALIANO**

### General

The above referenced project is located outside of both the water and sewer service boundaries of the Vallecitos Water District (District). Annexation into the water and/or sewer service area would be required in order to obtain water and/or sewer service. After annexation, service would be provided under the rules and regulations of the District, under normal operating conditions after all required fees have been paid and all conditions of the District have been satisfied. There are no existing District pipelines located within the boundaries of the project.

The following information is provided for the water and sewer sections of the Initial Study:

### **XVII. UTILITIES AND SERVICE SYSTEMS**

**b & c. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?**

As proposed, there is no impact to the Vallecitos Water District as the project is not located within the District water or sewer service boundaries. If Vallecitos Water District was to be requested to provide water and/or sewer service to the project, a water and sewer study would be required to determine if service could be provided and what impacts to District facilities could be expected. Annexation into the water and/or sewer district would be required in order to obtain water and/or sewer service.

**e. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

As proposed, there is no impact to the Vallecitos Water District as the project is not located within the water service boundary of the Vallecitos Water District. If Vallecitos Water District was to be requested to provide water service to the project, a water study would be required to determine if service could be provided and what impacts to District facilities could be expected. Annexation into the water district would be required in order to obtain water service.

**f. Would the project result in the determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

As proposed, there is no impact to the Vallecitos Water District as the project is not located within the sewer service boundary of the Vallecitos Water District. If Vallecitos Water District was to be requested to provide sewer service to the project, a sewer study would be required to determine if service could be provided and what impacts to District facilities could be expected. Annexation into the sewer district would be required in order to obtain sewer service.

## **Conclusion**

This project is not located within the Vallecitos Water District service boundary for either water or sewer service and the project has proposed obtaining water and sewer service elsewhere. Therefore, it is anticipated that the project, as proposed, will not have an impact on Vallecitos Water District. If, at a later date, water and/or sewer service is requested from the District, a water and sewer study would be required to determine if service could be provided and to identify any impacts to the District. Annexation into the water and/or sewer service area would be required.

This letter is issued for planning purposes only, and is not a representation, expressed or implied, that the District will provide service at a future date. The Vallecitos Water District relies one hundred percent on imported water supplies. Water may not be available at the time the project is built. Commitments to provide service are made by the District Board of Directors and are subject to compliance with District fees, charges, rules and regulations.

Valiano  
PDS2013-SP-13-001  
Page 3

Sincerely,

VALLECITOS WATER DISTRICT

A handwritten signature in blue ink, appearing to read "Eileen Koonce", is written over a light blue circular stamp.

Eileen Koonce  
Engineering Technician III

cc: Ken Gerdes, Director of Engineering and Operations  
James Gumpel, Principal Engineer





9335 Hazard Way • Suite 200 • San Diego, CA 92123  
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San Diego Local Agency Formation Commission

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July 19, 2013

Andrew Vanderlaan  
Public Member

**Vice Chairman**

John Ingalls  
Santa Fe  
Irrigation District

Beth Ehsan  
County of San Diego  
Department of Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123

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City of Imperial Beach

Sam Abed  
Mayor  
City of Escondido

**SUBJECT:** Notice of Preparation of an Environmental Impact Report  
for the Valiano Project (PDS2013-ER-13-08-002;  
PDS2013-TM-5575)

Dear Ms. Ehsan,

Thank you for allowing the San Diego LAFCO to provide comments on the above referenced project. LAFCO is responsible for encouraging the efficient provision of public services and has purview over changes to local government organization and any associated sphere of influence actions. LAFCO is generally a responsible agency for environmental review when jurisdictional changes and/or sphere of influence changes are proposed. Therefore, we offer the following comments:

**Alternate Members**

Greg Cox  
County Board of  
Supervisors

Sherri Lightner  
Councilmember  
City of San Diego

Jo MacKenzie  
Vista Irrigation District

Lorraine Wood  
Councilmember  
City of Carlsbad

Harry Mathis  
Public Member

**Executive Officer**

Michael D. Ott

**Counsel**

Thomas Bosworth

- The proposed Valiano project territory is currently located within the service area of the Rincon del Diablo Municipal Water District (MWD) for water sewer service, and the San Marcos Fire Protection District (FPD) for fire protection services. No changes to these service arrangements are proposed.
- The project description references two options for provision of sewer services to the project area: the preferred option, involving annexation to the San Diego County Sanitation District (SD) which would operate an on-site wastewater treatment plant that would be constructed with the project; or, annexation to the Vallecitos Water District (WD) which would provide sewer service via an offsite sewer line extension to the district's sewer system.
- The proposed project area is not located within the respective service areas or adopted spheres of influence for the San Diego County SD or the Vallecitos WD. Accordingly, the project would require LAFCO approvals of an amendment to the sphere of influence and annexation to the service area for either of the agencies identified in the proposed sewer service options.

SUBJECT: Notice of Preparation of an Environmental Impact Report for the  
Valiano Project (PDS2013-ER-13-08-002; PDS2013-TM-5575)

Page 2

- Because the proposed amendments to the subject agencies' adopted spheres of influence involve a substantial amount of territory, the agencies' spheres may be subject to a sphere review, and/or a comprehensive sphere update and associated municipal service review prior to LAFCO consideration of the project's proposed jurisdictional changes.
- As the proposed project requires LAFCO approvals for changes to local governmental organization and/or adopted spheres of influence and associated municipal service reviews, the San Diego LAFCO will be a responsible agency for environmental review.
- To ensure that the Environmental Impact Report (EIR) for the Valiano project will be germane to LAFCO's responsibilities as a responsible agency, the EIR for the proposed project should include, at a minimum discussions of: all required sphere of influence and jurisdictional changes, and associated sphere of influence and municipal service reviews; identification of existing and proposed infrastructure and capacities necessary to extend municipal services to the project area; existing and proposed land use designations; identification of any adjacent disadvantaged unincorporated communities and their needs and deficiencies for fire protection, sewer, and water services; and, the project's compliance with LAFCO statutes and policies related to preservation of prime agricultural and open space lands.

Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (858) 614-7788.

Sincerely,

A handwritten signature in black ink, appearing to read "RB Barry", with a stylized flourish at the end.

ROBERT BARRY, AICP  
Local Governmental Analyst

RB:ra

**Ehsan, Beth**

---

**From:** Smith, Oliver [oliver.smith@philips.com]  
**Sent:** Saturday, July 13, 2013 4:54 PM  
**To:** Ehsan, Beth  
**Cc:** J Arsivaud; Lael Montgomery  
**Subject:** Input on DEIR for Valiano Project

NON-PROFIT

Beth,

As I noted during public speaking at the meeting DPDS held on Wednesday July 10, 2013 regarding the Valiano Project, I am concerned that the traffic study did not specifically include traffic counts and impacts due to the Harmony Grove Village project. The Harmony Grove Village project that has been approved by the county calls for 742 dwelling units and is adjacent to the Valiano project. The Harmony Grove Village project is currently being built, so needs to be included in the Valiano analysis at full build out.

I would also like to raise a concern with the high number of cul de sacs with limited overall egress points, emergency or otherwise. I realize that the requirements on a limited number of isolated homes at the end of a long access road in a rural area are different than for other property configurations, but Valiano is a large scale (362 dwelling unit) project so should by necessity be held to a higher standard.

Oliver J. Smith  
Chair  
Valley Center Community Planning Group

---

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## Ehsan, Beth

---

**From:** Doug Dill <doug.dill@att.net>  
**Sent:** Friday, July 19, 2013 10:02 AM  
**To:** Wardlaw, Mark  
**Cc:** Ehsan, Beth; Loy, Maggie A; Sibbet, David  
**Subject:** NOP comments letter for Valiano - PDS2013-SP-13-001

Mark Wardlaw, Director  
Planning and Development Services  
County of San Diego  
5510 Overland Drive  
San Diego, CA. 92123

Dear Mr. Wardlaw,

The San Dieguito Planning Group appreciates the opportunity to comment on the Notice of Preparation for the Environmental Impact Report for Valiano/Eden Hills Project; PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-STP-13-003, PDS2013-TM-5575, PDS2013-REZ-13-001, PDS2013-ER-12-08-002.

### **Project Alternative:**

A plan that follows the Community Plan and current zoning should be included as one of the alternatives.

### **Project Description:**

The description of the project does not describe the adjacent communities accurately or they've been left off completely. None of the communities in the unincorporated area have been mentioned (Harmony Grove and Eden Valley). Many of these adjacent communities are very rural/estate rural in nature, including the San Marcos community of Coronado Hills located immediately to the west. There are rural commercial operations (equestrian facilities) adjacent to the project site and these descriptions should be included.

Calculation for allowed density does not correspond to current zoning. This should be addressed for accuracy based on the current zoning.

Neighborhood 5 is not in the sphere of influence of Escondido.

The location of the Village Limit Line is incorrectly indicated on the maps and description.

This project is proposed to be located in a valley that is approximately 3 miles long and a mile wide. Both the communities of Eden Valley and Harmony Grove lie within the valley that is constrained by hills to the east and west that rise above the valley floor several hundred feet.

### **Aesthetics:**

The visual impact of this proposed suburban community dropped into the middle of rural properties is significant. What is proposed to buffer these homes from the lesser dense properties? This project has significant visual impacts from every direction of the Valley and mitigation for this impact needs to be adequately addressed.

A gated community located in a rural residential community and is not consistent with character of the surrounding community.

How would the sewage treatment plant, an industrial facility, be buffered against existing and proposed residential lots?

The communities of Harmony Grove and Eden Valley are “dark skies” communities. How will the project align with this standard?

Description of the valley and elevation changes from the valley floor to the surrounding hills to the east and west should be included. This project will be visible from almost every public point on the valley. How will the project mitigate for this condition?

#### **Agricultural:**

How will the project mitigate for loss of significant agricultural acreage?

If the onsite sewage treatment plant is intended to irrigate the remaining avocado groves will the water quality (salt content) be at a level that will sustain the grove?

#### **Air Quality:**

There are several times per year that weather in this constrained valley creates a significant inversion layer trapping pollutants in the valley. How will the project address the increase in pollutants due to traffic increases and fire places in the valley as well as during the construction phase?

Will the air quality impacts be calculated on a cumulative basis with the build out of the adjacent Harmony Grove Village project in mind (742 homes)?

Located in the 2700 block of Country Club Dr. is a private child day care facility. This site qualifies as a sensitive receptor and should be addressed in the EIR.

Building of the sewage treatment plant brings three systems within a near radius of each other. What are the cumulative impacts for the addition of this plant to the neighboring plants?

#### **Biological Resources:**

The site appears to be potentially occupied by several species of concern and is part of an established regional wildlife corridor. While the project indicates that over 50% of the site will be preserved as open space, wildlife corridors appear to not exist in the proposed development pattern. The proposed development pattern should be evaluated for impact to wildlife corridors both local and migratory.

It appears to that a significant area of dedicated open space is “backyard open space”. Typically, backyard open space becomes problematic to home owners for issues of fire safety and privacy, and often loses its habitat and open space value. How will the integrity of the open space be protected with so much of it being backyard open space?

There appear to be several oak riparian/wetland areas on the project site. One such area, in neighborhood 3, is under mitigation order for previous impacts by the former property owner who illegally removed protected oak trees. The project as proposed appears to create incursions into some of these areas. This previously ordered mitigation needs to be satisfied before any additional construction, as well as study how the new construction affects this mitigation.

#### **Cultural Resources:**

The site appears to contain several significant archeological sites, including one site that may contain human remains. Should a full archeological survey be conducted of the site prior to project construction and how will these sensitive sites be properly protected in the long term?

#### **Geology and Soils:**

It appears that there may be seismic active zones in the southern end of this valley approximately a mile from the southern end of this project. This should be studied for potential impacts to proposed residences in this project that would be built on fill which could lead to significant liquefaction in a major seismic event.

Also noted in the NOP is the presence of soils with moderate or severe erodibility ratings. This may have both on site and off site impacts to proposed and existing residences.

Incidents of high water tables in heavy rains have resulted in soils liquefying under the weight of service vehicles in the past near neighborhood 3. This condition may limit the available area for development.

#### **Greenhouse Gas Emissions:**

This project is a 362 home project that is not served by transit (located over a mile from the entrance to the project) and will create over 3000 ADT's. How will the project account for the additional greenhouse gas emissions created by the additional vehicle trips in this constrained valley?

Cumulative effects from the build out of Harmony Grove Village should also be considered for the accumulative effect.

#### **Hazards and Hazardous Materials:**

A significant part of this project site has been under agricultural operations for several decades. What fertilizers and chemicals could exist in the onsite soils from this operation?

The protection for the public with a privately run sewage treatment plant should be addressed – specifically in the case of failure.

As mentioned in an earlier section, a private child day care facility exists in the 2700 block of Country Club Dr.

#### **Hydrology and Water Quality:**

It is presumed that the presence of an onsite package sewer treatment plant represents onsite use of treated/recycled water for open space and common area irrigation. This same situation will exist in the adjacent 742 home Harmony Grove Village project. The cumulative impacts of both projects should be studied as it relates to ground water quality, effects on nearby wells in the valley, and potential water quality impacts to the Escondido Creek and nearby tributaries.

The proximity of the water treatment plant is close to the Escondido Creek and its tributaries. What safety measures will be implemented to protect the creek in case of accident or breakdown of the plant?

Several upland tributaries to Escondido Creek exist on the project site. The proposed project appears to create incursions into these tributaries potentially creating water quality and hydrological issues downstream. How will the project mitigate for these impacts?

The proposed use of treated water from the treatment plant is to use for irrigation, particularly of the avocado trees. Will there be proper monitoring of the quality of this water to preserve the avocado groves (these fruit trees are very sensitive to sodium and treated water typically is heavy with sodium)?

**Land Use and Planning:**

The communities of Harmony Grove and Eden Valley engaged PDS over ten years ago in an intensive planning process in which the layout of Harmony Grove Village (742 homes) was designed, cooperatively, to limit suburban and urban densities beyond the Village Limit Line created by the Harmony Grove Village project and was resoundingly supported by not only PDS but the Board of Supervisors as well. This project represents a distinct departure from that plan. How will this affect future community relations with DPS in the area of planning and land use?

The rural versus suburban representative balance is in jeopardy with clustering of this project. How will this be mitigated to maintain this important representative balance?

**Noise:**

The properties in the existing community are large agricultural and equestrian properties. The impacts during construction will significantly impact the animals and these operations. How will the applicant assist the neighbors to protect their animals and the safety of those using these animals?

**Public Services/Safety:**

Fire and emergency routes need to be carefully studied and created, especially for Area 5, which is isolated from the emergency routes of the remainder of the project.

The fire buffer between the sensitive impact areas and the development of the houses has not been addressed. How will they protect these homes from fire?

**Transportation/Traffic:**

Cumulative impacts to traffic that include the development of this project will be significant. Downgrading of Country Club Drive, Harmony Grove Road, Elfin Forest Road in the Circulation Element, the double-tracking of the Sprinter line at Mission Road and Nordahl Rd., and the long term delay of the extension of Citracado Parkway will impact the traffic patterns and all these circumstances need to be included in the traffic studies with mitigation and infrastructure steps be developed.

Traffic impacts should be studied on a cumulative basis, including anticipated traffic from the adjacent Harmony Grove Village project (742 homes).

Sincerely,

Douglas Dill  
Vice-Chair/Seat 15  
San Dieguito Planning Group

**FRIENDS OF EDEN VALLEY FOR  
RESPONSIBLE DEVELOPMENT**

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*www.FriendsOfEdenValley.com*

July 19, 2013

Ms. Beth Ehsan  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

**Re: Response to Notice of Preparation (NOP) for EIR 13-08-002.**

Dear Ms. Ehsan:

Thank you for giving *Friends of Eden Valley for Responsible Development (FEV)* an opportunity to comment on the Notice of Preparation request for a 362-Unit residential subdivision. The Eden Valley Community, north of Harmony Grove, is a rural residential character with large lots and equestrian uses. The population of Harmony Grove is expected to increase dramatically as the Harmony Grove Village development pattern is built out. Eden Valley and Harmony Grove is concerned about the ability to keep its rural voice.

Currently, there is continual pressure to put higher density residential this area beyond what is allowed by the General Plan Land Use Map. Several non-resident land speculators have purchased local undeveloped land in the hopes that General Plan Amendments allowing higher density will be adopted by the Board of Supervisors. Residents will continue to work to preserve this historic 100-year-old community by implementing the Village Development Pattern that was negotiated with County Staff and approved by the BOS in August 2011. **FEV** are not opposed to growth consistent with the existing General Plan. However, development proposed that would involve a higher density than the approved General Plan is not supported, and would be a significant impact to the community.

In preparation of the Environmental Impact Report for the project identified above, please consider the following areas of concern in the environmental review document:

**Project Alternative:**

Please consider an alternative project plan that considers what could be done without a GPA. A plan that follows the current General Plan, zoning and community plan could reduce land use impacts, and would eliminate much of the widespread opposition from the local residents and other groups. We request an analysis to determine the current maximum number of dwellings possible under the current General Plan, and that be considered as an alternative project.



### **Project Description:**

The project description provided in the NOP is inaccurate. It references mobile homes parks and 5,000 square foot lots off La Moree Drive that are not directly adjacent to the site, and the project site does not provide any access to those features off La Moree Drive. Rather, land uses directly adjacent to the project site are low-density at one and two lot minimum in most instances, which large animal keeping and agricultural usage. The proposed neighborhoods 1-4 are within the community of Eden Valley, which is situated in a north-south running valley, along the base of the Coronado Hills to the west, and intersecting Harmony Grove to the south. Eden Valley is nestled between the cities of Escondido and San Marcos, and is within the City of Escondido's sphere of influence boundaries. This small valley is isolated by the topography of the surrounding hills, and is rural and equestrian in character with 1 and 2 acre minimum lots. A two lane, tree lined street is the only access to Eden Valley. Residents here value open space, quiet, dark nighttime skies, low traffic volume, equestrian trails and access to the abundant wildlife that flourishes in this beautiful rural environment lending to it's name...Eden Valley.

### **Landform/Aesthetics:**

The amount of landform modification for the proposed hillside lots on the western portion of the subdivision should be reduced. Lot layout should conform with the natural terrain. Slopes should typically be graded at a 2:1 ratio, and undulated to give a natural appearance. All slopes should be landscaped with a mixture of trees, shrubs, and ground cover PRIOR to occupancy of the first building. Residences should be architecturally compatible with each other and the surrounding neighborhood.

This valley has multiple existing creek tributaries to the Escondido Creek starting at TWO locations at the North end of the Eden Valley located near Hill Valley Drive. Both of those tributaries wander south through private properties, with an existing flood channel located on Eden Valley Lane, which then flows south to Mt Whitney Drive, and through the proposed neighborhood 5 of this project. This directly connects into the feature that will be restored which travels through the Harmony Grove Village project. Please address any potential impacts of ALL the tributaries within the Eden Valley area.

All of Eden Valley has a Dark Sky policy, yet the NOP states that there will be LESS THAN SIGNIFICANT IMPACT in section D: Create a new source of substantial light or glare, which would adversely affect day or NIGHT TIME views in the area? Please revise this and address any potential direct and indirect impacts in the environmental document.

Properties directly to the west of the project are designated as very-low residential with large animal keeping. The proposed hillside lots on the western portion of the subdivision are much smaller in size, and do not provide an adequate transition in lot size from very-low density in the west, to higher density to the east. In addition, are the proposed lot sizes bordering existing homes consistent with other planned residential developments within the area?

Within the Landscape Specific Plan (17-11) it appears that the planting will be of a different "theme" than the already established neighborhood. Please clarify what the Valiano theme is and why it will be different from the existing area plantings.

### **Agriculture and Forestry Resources**

According to a State farmland map, it appears the site is considered "unique farmland". How will the project mitigate for loss of these unique farmlands?

### **Air Quality**

The NOP states that the project involves a GPA that would result in approximately 125 additional residences (an increase from 237 to 362 units). How did the 237 units number come into existence?

The cumulative impact of project construction emissions needs to be evaluated in the context of other construction projects in the area. Additionally, the overlap between construction and operational emissions needs to be accounted for as well.

How will the substantial pollutant concentrations during construction affect the many horses and outdoor workers directly in the area?

### **Biological Resources**

The project states that over 50% of the site be preserved as Open Space. Please define what kind of open space this refers to, as much of the designated "open space" is within the backyards of the proposed lots. What are the proposed setback variances that should be put in place to avoid encroachment of proposed homeowners who may feel that they "own" their land and can do with it as they see fit.

The proposed projects tentative maps appear to isolate areas of biological importance and do not provide any wildlife corridors. This will have a major impact on the animal life and potentially create an increase road kill rate as animals move between the biological areas. This could also potentially increase human/wildlife contact. There is an existing wildlife corridor from the west onto the proposed neighborhood 3. As an example, eliminated lots 234-240 and 136-146 would allow this area which serves as an existing and functioning wildlife corridor to remain accessible to the oak/riparian area.

The project site contains multiple unique topographies, ecosystems and natural characteristics of our County. We believe these are fragile, irreplaceable resources that are vital to the general welfare of all residents. As such, we request that special controls on development be established for all areas within this project that contain wetlands, floodplains, steep slopes, sensitive biological habitats, and prehistoric and historic sites. Present methods adopted by the County must guarantee the preservation of these sensitive lands on and around this development. To protect these sensitive lands and prevent their degradation and loss, we request a detailed Resource Protection Study for this entire site.

Throughout the project there are many area specified with RPO setbacks. These setbacks are established to protect the oak riparian wetland areas, yet within the RPO setbacks there appears to be multiple project lots, roads and grading areas. Please clearly identify the "Wetland Buffers" which are lands that provide a buffer area of an appropriate size to protect the environmental and functional habitat values of the wetland, or which are integrally important in supporting the full range of the wetland and adjacent upland biological community. Please determine the appropriate buffer widths, which should be 50 to 200 feet from the edge of the wetland as appropriate based on the above factors. Where oak woodland occurs adjacent to the wetland, the wetland buffer shall include the entirety of the oak habitat. The proposed development pattern should be evaluated for impacts to the RPO setbacks and fuel management easements.

Within neighborhood 3, the current RPO setback line does not appear to include all of the area that is under mitigation order for previous impacts by the former owner. Please clearly define the entire area that is included under mitigation order, along with associated RPO setbacks and fuel management easements.

Within the Oak Riparian Wetland area of neighborhood 3, there is mandate to the previous property owner in place, which indicates that onsite re-vegetation and enhancement is to be conducted. Please ensure the proposed re-vegetation and enhancement takes place, but it should NOT be used toward the mitigation requirements for this project, as it is a pre-existing condition of that parcel.

Throughout the development site we have noted:

>> "Mature Riparian Woodland": A grouping of oak trees having substantial biological value, where at least ten of the trees have a diameter of six inches or greater.

>>"Native Vegetation": Vegetation composed of plants which originated, developed, or were produced naturally in the San Diego region and were not introduced directly or indirectly by humans. Native vegetation may be found in but is not limited to marshes, native grasslands, coastal/inland sage scrub, woodlands, and forests.

>>"Riparian Habitat": An environment associated with the banks and other land adjacent to freshwater bodies, rivers, streams, creeks, estuaries, and other surface-emergent aquifers (such as springs, seeps, and oases). Riparian habitat is characterized by plant and animal communities which require high soil moisture conditions maintained by transported freshwater in excess of that otherwise available through local precipitation.

>>"Sensitive Habitat Lands": Land which supports unique vegetation communities, or the habitats of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the State California Environmental Quality Act (CEQA) Guidelines (14 Cal. Admin. Code Section 15000 et seq.), including the area which is necessary to support a viable population of any of the above species in perpetuity, or which is critical to the proper functioning of a balanced natural ecosystem or which serves as a functioning wildlife corridor.

Please address the potential impacts and mitigation regarding each of these bullet points in the environmental documents.

### **Geology and Soils**

As noted in the NOP, there is the presence of soils with moderate or severe erodibility ratings. This may have both on site and off site impacts to proposed and existing residences. The existing private dirt easement on the North side of neighborhood 3 is a low point in that part of the Valley, and even with the slightest rain, soils washes away needing continual maintenance to keep it passable. Excess water from the wetland area in proposed neighborhood 3 is know to drain onto this off site easement.

There is a vary high water table in Eden Valley. Previous moderate to heavy rains have resulted in soils liquefying on the existing access road north of proposed neighborhood 3. You could literally see the ground move like a slow wave under foot, and numerous large service vehicles have sunk into the road.



It appears that a large portion of the proposed homes will be elevated, changing the current topography and drainage of the greater area. What is proposed to buffer the existing homes located in or adjacent to any "Floodplain" or "Floodplain Frindge" area which are relatively flat areas of low lands adjoining and including the channel of a river, stream watercourse, or other body of water which is subject to inundation by the flood waters of the 100 year frequency flood as shown on floodplain maps approved by the Board of Supervisors.

### **Hydrology and Water Quality**

According to Rincon del Diablo water district there is one of the largest natural aquifers located under our valley. How will the proposed grading, added street surfaces and other building items associated with this project affect the natural aquifer and it's ability to refill. This should be studied for potential impacts. Any blasting that will be performed during the grading phase should be studied to ensure it will not harm the existing aquifer under the valley, or the many wells in located in Eden Valley.

### **Land Use and Planning**

This project will physically divide AND isolate the established community.

This project will conflict with all applicable land use plans, policies and regulation of any agency with jurisdiction over the project INCLUDING the General Plan, Specific Plan, and zoning ordinance

Access (20-2) the NOP refers to “unnamed private road easement (north of Surrey Lane – a private road.” The Huston Ranch Road is a private dirt road with MAJOR drainage and erosion issues as well liquefaction issues directly related to parcel 232-492-01. This road is not a publicly maintained, 40’ wide easement. It is maintained by two current residents with our tractor at Huston Ranch. We are unaware of an easement which been granted for the benefit and use of the subject property. Please clarify this.

Preliminary Grading Plans (23-4) the NOP refers to “private unnamed easement road” slated for road improvement with grading plans. The Huston Ranch Rd is a private road and any road improvements must be agreed to by the current residents of this road prior to improvements.

### **Noise**

The established community is equestrian in nature. Horses are sound and movement sensitive with an innate “flight” response to such items. During construction, what kinds of safety precautions will be set into place for the many people who work directly with horses in the overall area. The valley is small with topography constraints that produce a rather loud echo throughout the area.

### **Population and Housing**

What cumulative growth inducing effects an/or impacts will result from bringing the non-existing infrastructure into our Valley?

### **Public Services**

The western portion of Hill Valley Drive appears to be too steep for the safety of vehicles and emergency trucks.

### **Transportation and Traffic**

Please include the HGV projects full build out traffic numbers in the CEQA baseline, and not just existing traffic.

The Citracado extension was an essential part of the HGV projects traffic plan, hence with this proposed development. If this extension is substantially delayed or is never completed, what alternate infrastructure steps will be developed to alleviate this issue?

As Country Club Drive will have a substantial cumulative increase in traffic due to this project, a sight distance study should be prepared for the intersections of ALL existing off-site private road easement used by 3 or more homes for health and safety issues.

How will the additional traffic from this development impact health and safety issues for Palomar Hospital with added congestion from the intersection of Country Club Drive to the 78 freeway?

The traffic study show note that although the posted speed limit is 45mph on Country Club Drive at Hill Valley, it is also posted as a Traffic Calming area , as well as posted Equestrian useage.

Please notify the *Friends of Eden Valley for Responsible Development* when the environmental document is available for public review and future public hearings. If you have any questions, please contact me at 858-735-0550

Sincerely,  
Janean Huston, Co-Chair  
Friends Of Eden Valley for Responsible Development  
1023 Country Club Drive  
Escondido, CA 92029



## San Diego County Archaeological Society, Inc.

Environmental Review Committee

25 June 2013

To: Ms. Beth Ehsan  
Department of Planning and Development Services  
County of San Diego  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Subject: Notice of Preparation of a Draft Environmental Impact Report  
Valiano  
PDS2013-SP-13-001, Log No. ER-13-08-002

Dear Ms. Ehsan:

Thank you for the Notice of Preparation for the subject project, received by this Society last week.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the County's environmental review process for this project.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: SDCAS President  
File



20223 Elfin Forest Road  
Elfin Forest, CA 92029

2013 Board Members:

Bonnie Baumgartner, Chair  
Jacqueline Arsivaud-Benjamin, Vice-Chair  
May Meintjes, Treasurer  
Mark Shields, Secretary  
Sandra Bartsch  
Jan Denny  
Nancy Goodrich  
Amy Molenaar  
JP Theberge  
Melanie Fallon, At-Large Member

July 18, 2013

Mark Wardlaw, Director  
County of San Diego  
Planning and Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 93123

RE: Response to NOP for EIR for the Valiano Project – PDS2013-SP013-001, LOG No ER-13-08-002

Mr. Wardlaw,

The Elfin Forest Harmony Grove Town Council appreciates the opportunity to comment on the Notice of preparation of an Environmental Impact Report for the project referenced above.

Portions of the project are located within our boundaries (Neighborhood 5). In addition, the project directly contravenes both the letter of our community plan, and the spirit in which the larger community, including Eden Valley, negotiated in good faith with the then Department of Planning and Land Use over several years of planning for increased density in our valley. The key element of the compromise reached was a Village Development Pattern, enclosed within a Village Limit Line, which added 742 dwellings to our enlarged community of about 700 at the time. The VDP ensured the highest density was located in the center of the village, with increasingly larger lots towards the Village Limit Line, in order to blend as well as possible within the surrounding rural area of multi-acre lots, several being equestrian estates. This proposed GPA would add urban densities outside of the Village Limit Line, and transform buffer areas between the urban density and existing rural residences into high density residential. We are very concerned about the impact of this potential breach of trust of our agreed overall planning scheme for the valley.

From an overall planning perspective, this backfill clustered housing project could result in checkerboard development, which contravenes the adopted goals and maps of the General Plan.

**Project Alternative:**

We respectfully request that one of the alternatives analyzed be a project feasible without the need for a GPA, but instead under the recently approved General Plan and associated Community plan. As part of that analysis this alternative should determine the current maximum number of dwelling units possible under the current GP.

**Project Description**

The project description does not accurately describe its immediate surroundings.

- Description of Harmony Grove, which Neighborhood 5 is located in, is completely missing.



- The equestrian commercial operations in Harmony Grove and Eden Valley are not mentioned at all
- Reference is made for example to a mobile home park, which is actually in the City of San Marcos over a mile away from the project site, and separated from the site and the community of Eden Valley by several one- and two-acre lots.
- The community of Eden Valley to the East of the site is comprised of large estate lots from one to 20 acres, not "one acre", nor "5,000 square foot lots to the North". Those lots are in the city of San Marcos beyond avocado groves on steep hills without any connection to the proposed site.
- The Village Boundary Line is not "one-quarter mile south of Neighborhoods One and Two". Neighborhood One (and Neighborhood 5) appear to be situated ON the boundary line.

### **Traffic Impact Analysis:**

1. Baseline calculation: Since CEQA requires that the baseline be defined for comparing impacts, we request that baseline to include the full build-out of the adjacent Harmony Grove Village project, since it will likely be completed before Valiano would be built.
2. Impact of Citracado Parkway extension delay (or possible abandonment): The TIA states that the Citracado extension will be completed by 2015. The Union Tribune noted in its June 24, 2013 issue that the City of Escondido has announced start of construction will not start as planned this year (see <http://www.utsandiego.com/news/2013/jun/24/tp-cash-crunch-stymies-road-connect-work/>). The Director of Public Works is on record stating that instead of the 2015 planned opening, which was assumed in the Traffic Impact Analysis for HGV, it will now be "eight years" until that road is completed. The Valiano TIA needs to be redone to reflect the impact of non-completion within at least 8 years.
3. Restating of past baseline to calculate cumulative impact: Related to that last point, we request that the results of the traffic analysis of the HGV ADTs used to calculate cumulative traffic, if used, be based on a REVISION of the approved Harmony Grove Village EIR traffic study from 2007, to take into account this material change on the ground. At the time, it was contemplated a majority of traffic would exit the project towards the new Citracado extension, but now the assumptions need to be corrected to reflect the new reality that this extension may not be built for 8 years, if ever, according to the relevant agency, the City of Escondido.
4. Temporary impacts due to timing of improvements such as, but not limited to, the Citracado extension, should be fully analyzed and mitigated.
5. Changes to the status of existing roads: Country Club Drive (designed to handle only 4,500 ADTs) and Kuana Laua are non Mobility Element roads since the Public Facilities Element was eliminated as part of the General Plan. They are at risk of being added back to the Mobility Element Plan due to the added project traffic which would lead to deficient LOS by 2035. This is another example of a past compromise we ask the Department to honor: while accepting a doubling in housing density and a severe traffic impact from HGV, we also worked to downgrade not only these two roads to Minor Collectors, but also Harmony Grove Road and Elfin Forest Road. This took years of cooperation and collaboration with the developer, the Department of Public Works, DPLU, and the community. A GPA of the magnitude proposed, especially when combined with the change in planned improvements in Escondido, could jeopardize years of good faith collaboration, and result in these roads needing to be reclassified to accommodate the additional traffic impact.
6. Impact of road improvements on community character: The FPP from San Marcos Fire Department requires several local rural roads to be improved to DPW road standard, and their own minimum is 24' wide. This will affect community character for existing residents (Mt

Whitney Road, Eden Valley Lane, and Hill Valley Drive). Policy CM-2.3.1 of the approved Harmony Grove Community Plan states “restrict local public roads to two lane, undivided, curving streets”. In addition, the San Dieguito Community Plan Circulation Policy 2 states “road alignment shall minimize the necessity of altering the landscape by following the contours of the existing, natural topography thus enhancing scenic vistas”. Circulation Policy 6 also states “Classification of Mobility element Roads should reflect the low intensity land uses adopted in the San Dieguito Community plan”.

### **Health and Safety Impacts:**

1. Evacuations: Existing and future residents alike could be facing a dangerous situation in an emergency such as a mass evacuation due to a wildfire or an earthquake. The Law Enforcement comments in the Scoping Letter stated: “The limited roadway access points may be cause for future concern in the event that mass evacuations are required for say, a wildfire”. Improving the current roads may not be sufficient to allow the existing residents with their horse trailers to evacuate on time once the HGV project is fully built-out, especially with Citracado extension off the map, and a doubling of the Sprinter line schedule, which creates a bottleneck for evacuation to the North. The EIR should evaluate worst case conditions at full build-out without Citracado to evaluate whether current and future residents of HGV and Valiano could safely evacuate on Country Club and/or Harmony Grove Road. The most useful analysis would determine a maximum number of dwellings in the valley to allow for safe egress in case of emergency evacuation. Prevailing winds and past fire emergencies patterns should be modeled, to determine the wisdom of adding potentially over 1,000 people in a bottlenecked valley already at the wildland - urban interface.
2. Building in a flood plain: Several proposed neighborhoods, including Neighborhood 5, are proposed to be raised out of the flood plain to build homes above it; what will be the impact on neighboring residences in the event of a flood? The area already floods regularly without modifying the drainage patterns. Where will the displaced water drain to? What will be the aesthetic and visual impact from the local public roads and residences?
3. High number of cul de sacs with limited overall egress points. The proposed design could be problematic in case of emergency evacuation.
4. Neighborhood 5 isolated from emergency routes of remainder of project. Should Country Club Drive be affected by the emergency (such as a wildfire or other catastrophic event from that direction), how will residents be able to evacuate safely?

### **Dark Skies Policy Impacts:**

The San Dieguito Community Plan Dark Skies Policy 1 states that “In general, outdoor lighting (...) must not be visible from any adjoining property or street”. How will a development of 362 homes in the middle of a rural valley, with some homes stepped up the hillside, others raised above existing residences, be able to meet that requirement?

### **Cultural Resources Impacts:**

The Fines Historic Complex needs to be tested to make a determination of significance.

### **Geology and Soils:**

We believe the statement on page 18 of the Environmental Checklist Form may be inaccurate: “The project (...) will not alter existing drainage patterns; is not located in a floodplain, wetland or significant drainage feature”. The EIR should analyze whether raising Neighborhood 5 and other areas above current

residences to situate it above the flood plain will result in drainage or other related issues for surrounding properties.

### **Biological Resources:**

The San Marcos FD FPP calls for 150' fuel modification zone "from all sides of all structures". How will this be accomplished with the planned layout without affecting the biological resources onsite? Will there be any biological open space left onsite with this requirement at the proposed density?

### **Community Character and Community Plan conformance:**

The proposed project detracts from the existing community character with small lot sizes, higher residential density, destruction of wildlife corridors, and lack of space for equestrian uses within the lots. As designed it also destroys the existing and essential buffering function of the project site itself. The EIR should analyze the following impacts:

1. Buffers: The Harmony Grove Community plan Policy LU 2.1.4 requires "an open space buffer between urban areas and rural community to preserve character of unincorporated community". The Neighborhood 5 property was supposed to provide that buffer between HGV and the rural community. The highest density is now planned in that former buffer zone. Please analyze impacts on community character.
2. Greenbelt: General Plan Policy LU 2.5 promotes the use of greenbelts to define communities "to reinforce the identity of individual communities". Staff notes "the project site appears as a green belt between San Marcos and Eden Valley". The proposed onsite open space will not function as a green belt because a) it is within a gated community and b) it adds 362 homes into a green belt, which by definition is free of high density.
3. Lot size: The current project design does not meet the Harmony Grove Community plan Policy LU-1.5.1: "Require minimum lot size of 2 acres outside the Village Boundary (...)". As stated above in "alternative project", the EIR should evaluate the impact of developing within current General Plan guidelines.
4. Animal keeping: The current project design also violates HGCP Policy LU-1.5.3 "Provide for lot sizes that will permit residents to keep market and leisure animals on their property".

Thank you for the opportunity to comment.

Sincerely,



Jacqueline Arsivaud, Vice-Chair

CC: Beth Ehsan, Maggie Loy

Mark Wardlaw, Director  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123



P.O. Box 460791  
Escondido, CA 92046-0791  
[www.escondidocreek.org](http://www.escondidocreek.org)  
[information@escondidocreek.org](mailto:information@escondidocreek.org)  
760.471.9354

July 18th, 2013

Re: PDS13-SP-13-001. LOG NO. ER-13-08-002; VALIANO

**BOARD OF  
DIRECTORS**

**Kevin Barnard,**  
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Scientist  
**Brent Alspach**  
Environmental Engineer  
**Richard Murphy**  
Operations Manager  
**Greg McBain**  
Retired Engineer

**Of counsel**  
**Everett Delano of**  
**Delano Law Offices**

Dear Mr. Wardlaw,

Thank you for the opportunity to comment of the Notice of Preparation for the EIR of the Valiano project. Please find the following comments below regarding the proposed project. The Escondido Creek Conservancy (TECC) is a non-profit, public benefit, corporation, incorporated in 1991, dedicated to the preservation, restoration and protection of the natural open space within the Escondido Creek watershed. TECC believes the natural lands within the watershed are an irreplaceable natural asset with great community value. We support educational programs and compatible outdoor recreation within the watershed for the benefit of all residents of the area.

**Biological Resources**

The current design of the Valiano project isolates open space areas by the homes, roads and associated infrastructure that are part of the plan. It appears that the quality of the open space is compromised by this design and should not be considered 'of like kind' with regards to use as mitigation (high quality habitat that is circumvented by development should not be used as mitigation). In addition, the defensible space within these open space areas should not be included as mitigation, as this area is subject to being mowed, brushed, cleared etc.

Wildlife corridors are obstructed by the current design of the Valiano Project. The wetland areas and Riparian corridors are either obstructed or isolated from each other. Neighborhoods 2, 1 and 5 are within proximity of the Harmony Grove Village project and should provide connectivity to any existing wildlife corridors and open space areas including riparian areas/tributaries to Escondido Creek.

The current design of the plan increases the risk of isolating wildlife, and also increases the risk of wildlife subject to road kill without the appropriate conservation, preservation of riparian corridors, and implementation of wildlife corridors. How will wildlife corridors be incorporated if the natural areas are not preserved? How will the wildlife be protected from traffic?

**The Escondido Creek Conservancy (TECC)** is a non-profit, public benefit, corporation dedicated to the preservation and protection of the natural open space within the Escondido Creek watershed. We support educational programs and compatible outdoor recreation within the watershed for the benefit of all residents of the area.

There are areas of non-native grasses and old agricultural pastures onsite that provide significant foraging grounds for many species in the area, and also provide a wildlife corridor in the project area. These species also provide vector control of rodents and insects to the area. Such species include, but are not limited to: coyote, bobcat, Mountain lion, California long-tailed weasel, opossum, raccoon, Red-tailed hawk, Barn owl, California horned lark, Coopers hawk, Northern Harrier, Merlin, Prairie Falcon, American Kestrel, Turkey Vulture, Red Diamond Rattlesnake, Southern Pacific Rattler, and Rosy Boa.

Local residents, naturalists, wildlife enthusiasts and scientists have observed the following wildlife species within the impact areas and immediate surrounding areas: Bobcat, Mountain Lion, American Badger, Southern Mule Deer, Coyote, Bald Eagle, Golden Eagle, Red-tailed hawk, Red-shouldered hawk, Sharp-shinned hawk, Osprey, American Kestrel, Northern Harrier, Cooper's hawk, white tailed kite, Merlin, Prairie Falcon, American Peregrine Falcon, White-faced Ibis, Turkey Vulture, Barn Owl, Western Screech Owl, Great horned Owl, California Gnatcatcher, Southern-California rufous-crowned sparrow, Western bluebird, yellow warbler, Canada Goose, San Diego Horned Lizard, Orange-throated whiptail, Western spadefoot toad, Southern pacific rattlesnake, red diamond rattlesnake, rosy boa, king snake and western pond turtle. Also Anna's hummingbird, costa's hummingbird, bushtit, pine siskin, Wilson's warbler, lesser goldfinch, wren, cliff swallow, American robin, northern mockingbird, California quail, mourning dove, western scrub-jay, purple finch, house sparrow, white-crowned sparrow, yellow-rumped warbler, house finch, dark-eyed junco, western wood-peewee, fox sparrow, ash-throated flycatcher, western kingbird, Nuttall's woodpecker, acorn woodpecker, hooded oriole, western meadowlark, California towhee, spotted towhee, European starling, American crow, common raven, greater roadrunner, black phoebe, red-winged blackbird, black-necked stilt, snowy egret, mallard, killdeer, cormorant, great egret, great blue heron, belted kingfisher, and American white pelican. California ground squirrel, pocket gopher, American bullfrog, pacific tree frog, western toad, southern alligator lizard, western fence lizard, western whiptail, gopher snake, and garden slender salamander.

Has anyone observed the brown headed cowbird in this area? This species parasitizes the nests of Least Bell's Vireo. IF LBV is observed in the impact areas/project footprint, the cowbird should be addressed in the study and how impacts will be avoided/managed long term.

With regards to the wetland areas, drainages and riparian areas. Should there be impacts to these habitats; mitigation should include the restoration of these areas and control of non-native plant and animal species such as the American Bullfrog and other vectors of Chytrid fungus that will have an impact on the native amphibian species in this tributary to the Escondido Creek Watershed.

There are a number of bat species in the area; there should be biological surveys to include this species. Foraging bat and roosting bat surveys should be done.

The Escondido Creek watershed is part of the Pacific Flyway for migratory birds, impacts to these wetlands in the project footprint will affect this important resource for migratory birds, protected under the migratory bird treaty act. Many migratory birds have been seen in this area, and surveys should be done accordingly. There are a number of aquatic species in the wetlands, and the

biological survey should include these areas for nocturnal and diurnal species. Will mammal trapping be part of the biological surveys?

In addition, the Harmony Grove Village Project should be included with regards to overall cumulative impacts to the area in conjunction with certain studies (because the project is in construction at this time-modeling will need to be used to project anticipated impacts for certain studies), including but not limited to: Traffic Studies, Climate Analysis, Air Quality, Noise Analysis, Impacts to Night Skies, Evacuation Plan, Fire Protection Plan, Noise Analysis, Land Use/Community Character Study, Agricultural Technical Report.

Other Document Requests:

Please include in the Draft EIR the following studies:

Biological Resources Report with Conceptual Resource Management Plans (On- and Off-Site) Emergency Response Plan and Risk Management Plan, Evacuation Plan, Fire Protection Plan, General Plan Amendment Report, Geotechnical Report, Groundwater Investigation, Hazardous Materials Information, Land Use/Community Character Study, Letters of Permission (Easement Holders), Off Site Biological Mitigation Information, Open Space Fencing and Signage Plan (Biological Open Space), Phasing Plan, Photometric study, Trails Plan, Vector Management Plan, Visual Resources Plan to include impacts to Night Skies, Water Service Report, Water Supply Assessment.

Thank you for your time and consideration of these comments.

Respectfully,

A handwritten signature in black ink that reads "Angelique Hartman". The script is fluid and cursive, with the first name and last name clearly distinguishable.

Angelique Hartman  
Environmental Consultant and Land Use Committee Member  
The Escondido Creek Conservancy



July 21, 2013

Ms. Beth Ehsan  
County of San Diego,  
5510 Overland Drive  
San Diego, California 92123

Via email: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

Dear Ms. Ehsan:

**SUBJECT:** Scoping Comments for PDS2013-SP-13-001, LOG No. ER-13-08-002; Valiano

San Diego Audubon Society appreciates this opportunity to comment on what to include in the Environmental Impact Report for this project. The proposed project intends to build a large suburban development in an rural and agricultural area. As such it will require an amendment to the new General Plan and will potentially have very significant environmental impacts of many types. We urge that the EIR fully identify these impacts and mitigation measures that will fully offset them, and make it clear which impacts cannot or will not be fully mitigated.

**AGRICULTURE:** The project will bring suburban residents into an agriculture area. They are likely to object to insects, odors, sounds, chemicals, etc. that can accompany agriculture. This can lead to political pressure to eliminate, or at least degrade nearby agricultural productivity. We urge that the EIR fully evaluate this potential impact on agriculture.

**AIR QUALITY:** The project will develop 362 units. The General Plan would allow 237 units. The Notice of Preparation suggests that the EIR will address only the air quality impacts of the difference, 125 units. While this may be legal it is definitely misleading and dishonest. The fact that the General Plan would allow 237 units does not mean they would have ever been built. We strongly urge that the EIR compute and describe the mitigation that would be required the air quality impacts of the construction of the project, the transportation for people living in and providing services to the project, and from the heating, water heating, water pumping, and cooling that will be required for the life of the project. Analyzing just the increment between the General Plan and the proposed Amendment is likely to result in an inappropriate decision.

**BIOLOGICAL RESOURCES:** The Public Notice mentions that the project may have significant impacts on sensitive species, sensitive habitat communities, wetlands and wetland buffers, drainage, wildlife movement and dispersal corridors, and local habitat conservation plans. We urge that the EIR fully identify those resources, the potential impacts, all feasible mitigation for them, and the extent to which the impacts will not be offset by the mitigation. For a suburban/rural development like this maintaining wildlife movement corridors is especially important. We urge that the EIR provide sufficient measures and space for this purpose.

The project will include equestrian facilities, which will increase the use of horses on trails outside of the project area. This use will result in horse droppings outside of the footprint of the project. The droppings will tend to attract cowbirds, whose parasitism will threaten the reproductive success for least Bell's vireos and other sensitive species. We urge that the EIR quantify this impact and require mitigation that will offset this impact inside and outside the footprint of the project.

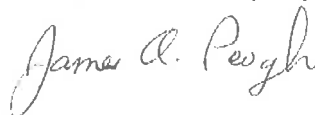
**GREENHOUSE GAS EMISSIONS:** This project will produce a suburb development of 362 units in a rural location far from urban services, materials, and facilities. As such it will result in the emission of an extremely large quantity of greenhouse gas. The Notice of Preparation mentions the County's Draft Guidelines for Determining the Significance for CEQA documents. Those guidelines have not been adopted and must not be used for this project. We strongly urge that the EIR actually compute the expected level of the greenhouse gasses that will be emitted in the course of the construction of the project, the transportation for people living in and providing services to the project, and from the heating, water heating, water pumping, and cooling for the life of the project. The project will also provide for horses. The GHGs that will result from those horses should be included. There is no justification for the County to allow some vague comparison to a not very similar hypothetical project to determine the impacts of this project. The project should be required to mitigate for the difference between the volume of GHGs from this project and an efficient urban infill project for the same number of units.

**HYDROLOGY AND WATER QUALITY:** In section VIII b) the Notice of Preparation points out that the project is within a Hydrologic Unit that is already impaired for Coliform bacteria, nutrients, and sediments. It indicates that the impact of the project will be "Less than significant with mitigation incorporated" with no explanation. We urge that the EIR quantify the sources of these pollutants that will result from the project, including the equestrian activities and quantify the removal capability of each BMP that will be provided for construction and post construction to verify that the projects will not further degrade the downstream impaired waterways. The EIR should also indicate at what storm conditions the BMPs will no longer be able to treat the pollution. We also urge that the EIR specify the level of maintenance that will be required to keep the BMPs functioning at the necessary level. It is not adequate for the EIR to simply provide a laundry list of BMPs that might be used and assert that they will prevent the impacts.

In section VIII f) the Notice of Preparation indicates that "The project could have an adverse effect on drainage patterns or the rate or amount of runoff because it could significantly impair, impede, or accelerate flow in a watercourse of increase erosion or siltation." Oddly, it indicates this impact will be "Less than significant with mitigation incorporated". To accomplish this, building pads will be located outside the lines of inundation for the 100-year flood plain. However these increases in rates and amounts of runoff will also have an erosion, siltation, flooding, or mudslides impacts on development, infrastructure, and waterways outside of the development. We strongly urge that impacts to offsite development, infrastructure, waterways, and downstream water quality be evaluated and either avoided or mitigation in the EIR.

**WATER:** Large-lot, suburban/semi-rural developments tend to use large quantities of water for a variety of reasons. In section XVII e) the document discusses difficulties for getting water service to and reservoirs for the project. However it does not point out that this sort of development is a very inefficient use of water. We urge that the EIR compute the expected water use for this development and the energy needed to get the water to the users. We also urge that the project be required to provide mitigation to reduce those levels and to offset their water consumption impacts on the region. We also urge that the EIR include the impacts of the additional piping to bring water to the project and the construction of the needed reservoirs.

Please keep us informed of future documents, hearings, and other milestones for this project. For questions or follow up I can be reached at 619-224-4591 or [peugh@sandiegoaudubon.org](mailto:peugh@sandiegoaudubon.org).



James A. Peugh  
Conservation Committee Chair  
San Diego Audubon Society



Auer  
Bartsch  
Batchie  
Baumgartner  
Bemanian  
BemanianA  
Besprozvanny  
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CavenderB (2)  
CavenderD  
Deaver  
Erforth  
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Hoppenrath  
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Laderman  
Lesser  
MashburnB  
MashburnS  
Matteoni (2)  
McClun  
McSparrow (2)  
Mohler  
Osborn  
Porter  
Register  
Register  
Riley  
Savage  
Searles  
Semensow  
StraupeA  
StraupeM (2)  
Travis  
Tucker  
Walsh  
Wright

**Ehsan, Beth**

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**From:** Sadie Rose [sadierose82@gmail.com]  
**Sent:** Friday, July 12, 2013 10:12 AM  
**To:** Ehsan, Beth  
**Subject:** Comments from July 10th Friends of Eden Valley for Responsible Development

Hi Beth,

I am writing as a concerned citizen living in the Eden Valley area of Escondido.

We have a serious issue with this development as we just bought a house in Eden Valley four months ago and we are expecting our first child in August. We bought in this area because we value the open space, large lots, dark nighttime skies, low traffic, wildlife, and quite that is our current neighborhood and we feel the proposed development and developer do not plan to follow the things we currently value in our community.

Thank you very much!

Sadie and Ryan Auer

## Ehsan, Beth

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Bartsch

**From:** Sandra Bartsch <sandra@sbeventprod.com>  
**Sent:** Friday, July 19, 2013 10:53 AM  
**To:** Ehsan, Beth; Loy, Maggie A  
**Subject:** Comment to NOP for EIR for the Valiano Project

Beth, Maggie -

We have been residents of Elfin Forest for the past 6 years. We moved to the valley because it is literally one of the the last "pockets" of rural, open space living in North County West of the 15 Freeway.

We purchased our home, and we are raising our 5 year old son here. It is very important for us that our son grows up surrounded by open space, wildlife and a somewhat still functioning eco system.

Being constantly faced with the threat of new large developments encroaching on our little community is very painful, and we feel that our rural lifestyle is under literally being attacked. We are very aware and concerned that new developments being approved in the area will change our lifestyle here so much that we will actually have to leave. That would mean for us leaving the San Diego area, because we do not see any other areas that are similar to Eflin Forest/HG - rural yet in close proximity to the ocean and the beach communities.

Harmony Grove Village, which is currently being built, will add about 800 new homes to our valley. This will put a lot of pressure on our rural lifestyle and the eco system in the valley.

Here are some concerns we have regarding the Valiano project specifically:

1. The county just recently approved a new General Plan, which was in the works for many years. Residents worked very closely with county staff to come up with what we consider a compromise that we can live with in regards to the density and zoning in Harmony Grove, Eden Valley and Elfin Forest. A General Plan should be considered the "rule book" and Master Plan that everybody follows. I see NO REASON, why this new plan should be amended to approve a higher density for the Valiano Project.
2. Valiano (specifically Neighborhood 5 ) would ruin the "open space buffer" that is supposed to exist between urban areas (Harmony Grove Village) and our rural community.
3. Traffic - The increase in traffic that we will face already due to the fact that Harmony Grove Village is being built, and the fact that the proposed and promised Citracado Parkway extension is being delayed (or might not be built at all), will for sure be significant. Increasing the density for the Valiano Project and building even more homes will put way too much pressure on Country Club Lane and Harmony Grove Road.

We are also very concerned about the increase in traffic on Elfin Forest Road. We cross this road by foot, bike and horse constantly. Significantly increased traffic will mean a health and safety risk to us, our child and our animals.

For your your traffic analysis, please take into account what the traffic will be like once Harmony Grove Village is completed especially without the Citracado Pkwy extension.

4. Evacuations. Evacuations of people and animals are already very scary, since there are very few outlets from the valley. Every increase in density increases the risk to our health and safety in case of an emergency evacuation.

5. Gated Community: Having a gated community in our valley is not acceptable for us. We moved to this Valley because we did not want to see and live around gated communities.

6. Traffic safety during construction. We are already seeing a huge increase in large vehicle traffic on Harmony Grove Road and Country Club. We consider increased truck traffic in our valley a safety risk to us and our child.

7. Wildlife. With more of the open space in the valley being destroyed, we are very concerned about the ability for wildlife to survive.

8. Preservation for future generations. 85% of the coastal chaparral is gone. We need to preserve what still exists for our future generations. Any amendments to the General Plan, increased density in the interest of the developers sets a bad precedence. We need to stop destroying what is left of our open spaces.

I respectfully request, that an alternative to the proposed project be analyzed, which would not increase the density of the properties but instead adhere to the recently approved General Plan and the associated Community Plan.

Sincerely

Sandra Bartsch  
7753 Camino Sereno  
Elfin Forest  
Phone: 310 600 8184

**Ehsan, Beth**

Batchie

**From:** Jack Batchie [jackbatchie@yahoo.com]  
**Sent:** Saturday, July 13, 2013 4:15 AM  
**To:** Ehsan, Beth  
**Cc:** EdenValleyNews@aol.com  
**Subject:** Fw: Valiano Project PDS2013-SP-13-001

Dear Beth,

Please note the correction below where I stated "If you make a left hand turn onto Country Club and travel south" is corrected to "travel **north**". Thank you.

Best regards,  
John Batchie

----- Forwarded Message -----

**From:** Jack Batchie <[jackbatchie@yahoo.com](mailto:jackbatchie@yahoo.com)>  
**To:** Beth Ehsan <[beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)>  
**Sent:** Friday, July 12, 2013 6:30 PM  
**Subject:** Valiano Project PDS2013-SP-13-001

Dear Beth,

I am a resident of San Diego County, residing at 2958 Mount Whitney Road, Escondido, 92029. I attended the meeting at the Elfin Forest Fire House on July 10th referencing the Environmental Impact Report NOP for this project. We were instructed to forward our specific project concerns to your office. I will have many concerns as the project evolves, however at this time I would like to address one as stated below:

**To:** *Sand Diego Planning and Development Services*

**From:** *John M. Batchie*  
*2958 Mount Whitney Rd.*  
*Escondido, Ca 92029*  
*[jackbatchie@yahoo.com](mailto:jackbatchie@yahoo.com)*  
*760-480-6120*

**Subject:** *Valiano Project PDS2013-SP-13-001*  
*Traffic Concerns-Mount Whitney Road, Country Club Drive*

*As indicated on the developer's plan, Mount Whitney Road will be the only entrance to, and exit from the southern part of the development. This will result in a huge increase in traffic for this present rural road. Taking that into consideration, I am sure that a traffic signal will be required at the intersection of Country Club Drive. If you make a left hand turn onto Country Club Drive and travel **north** approximately 50 yards you approach a three(3) way stop intersection with Kauana Loa as the intersecting street. My concern is not only the huge traffic increase on Mount Whitney to Country Club, but coupled with the significant increase in traffic also on Country Club due to the Harmony Grove Village project (approx 700 homes). What are the plans to provide traffic controls for these 2 close proximity intersections? I cannot visualize two traffic signals efficiently handling this significant increase in traffic. Thank you for your consideration.*

**From:** Bonita Baumgartner <bonniedblb@gmail.com>  
**Sent:** Friday, July 19, 2013 9:28 AM  
**To:** Ehsan, Beth  
**Subject:** Valiano Specific Plan; PDS2013-SP-13-001

Public Scoping Comment Sheet:  
To: Mark Wardlaw, Director

Thank-you for the opportunity to comment on this project. I am a home owner in Elfin Forest, and have been active in maintaining the rural atmosphere of the Elfin Forest /Harmony Grove Planning area.

This area has worked long and hard to protect and foster a rural atmosphere. This last GP2020 that our community worked on with the DPLU and resulted in 1 to 2 acre parcels in the Eden Valley area . The GP took ten years, millions of dollars, and collaboration with the community. Why would the county even consider scraping this hard won plan? The Valiano project totally disregards the compromise the community made by accepting the higher density of Harmony Grove Village with concentric decreases in density, and totally changes the character of the valley.

In addition, with the lack of completion of Citracado, Country Club Road which was slated to stay rural, and is 'traffic calmed' will no longer be either. It is already the only plausible north exit out of Harmony Grove Village. The addition of the extra traffic from the Valiano project with its now proposed higher density makes this a health and safety hazard, and totally disregards the rural aspect that this community is trying to maintain. In addition, with the proposed increase in rails for the Sprinter, and the lack of completion of Citracado-emergency evacuation for fire or earthquake would be severely impacted.

The amount of earth, grading necessary for this project to create pads for housing/ streets greatly disturbs the visual rural aesthetics , as well as compromises habitat for local raptors, and other wildlife.

This area has a water contributory to the Escondido Creek, as well as a green belt used by animals, birds, etc to migrate in the area. Creating an urban area, the raising of the wetland area in Area V of this project could cause problems with flooding upstream, as well as disruption of habitat.

In addition,' a gated urban community 'on small lots is out of character with the livestock, large animal keeping character of Eden Valley, Harmony Grove. They may be creating trails for their own use but it is not in keeping with the existing community plan.

I would request that this project only be approved if it stays completely consistent with the recently approved General Plan , on 1-2 acres lots, with MINIMAL grading. The approval of a higher density project would be a huge betrayal of this community.

Thank-you



Bonita Baumgartner

20049 Elfin Forest Lane  
Escondido, CA. 92029  
[bonniedblb@gmail.com](mailto:bonniedblb@gmail.com)

**Ehsan, Beth**

Bermanian A

**From:** Ali Bermanian <ab@pacificplayinc.com>  
**Sent:** Friday, July 19, 2013 9:22 PM  
**To:** Ehsan, Beth  
**Cc:** Bermanian Ali; E B  
**Subject:** Re: agenda for tonight's public EIR scoping meeting

**Importance:** High

**Beth,**

I was at the last meeting, along with my wife Elizabeth. I believe that Elizabeth has already send you the form with his concerns, one of which was security..... Unfortunately, she might have not elaborated on that portion of the concern enough (please add these comments to her comments). The point is that we own (under different entities) 3 adjacent properties with this proposed development (APN 222-102-26, 222-102-27 and 222-102-22). These properties contain approx. 1,000 income producing avocado trees – this is our farm business which we have put a lot of time, money and other resources into it during the past ten years. With the new development and the increased traffic, we have a serious security concern with teenagers as well as others trespassing into our avocado farm, vandalize the property, create a fire hazard by smoking, etc.

My question is, can the developer guarantee our safety? If not, how is that going to be mitigated?

Thanks You.

Sincerely,

Ali Bermanian

On behalf of:

Bermanian Ranch

Bermanian Living Trust

Vista Pacific Limited Partnership

575-Seeforever Drive,  
San Marcos, CA 92010  
760-855-3688

**From:** [Ehsan, Beth](#)  
**Sent:** Wednesday, July 10, 2013 12:44 PM  
**Subject:** agenda for tonight's public EIR scoping meeting

Good Afternoon,

Just a quick reminder, tonight is the public scoping meeting for the Valiano project.

As previously announced, the meeting starts at 7:00 pm at the Elfin Forest Fire Station, at 20223 Elfin Forest Rd, Elfin Forest, CA 92029.

Attached is the agenda for your information.

Thanks,

Beth



Bemanian E

Mark Wardlaw, Director  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123

**Re: PDS13-SP-13-001. LOG NO. ER-13-008-002;Valiano**

Dear Mr. Wardlaw:

I appreciate the opportunity to comment on the Notice of Preparation for the EIR of the Valiano/Eden Hills Project.

As indicated and acknowledged in the County's own initial environmental study of this area, there are far too many factors of great concern to elaborate on in this letter so I'd like to address the factors that I am most familiar with.

**Loss of Privacy, Tranquility, Security**

We have lived on Seeforever Drive in Coronado Hills going on 24 years. We have three parcels that will be severely impacted. The fence line of our close to FIVE acre parcel is directly adjacent to where several clusters of homes will be located. Rumor has it that some of these lots may be as small as a 1/10 of an acre? **Going from a five acre parcel down to less than the current 1-2 acre zoning is unacceptable and would be devastating!** Where's the buffer zone? As I understand the avocado trees that might actually provide a buffer in this part of the proposed project will be removed and replaced with homes.

People who live in Coronado Hills (as well as Eden Valley) choose to live in this unique area for the beautiful views, serenity, security, peacefulness and much more. All of this will be destroyed if this zoning reduction request is passed. In addition, the residents in Coronado Hills don't invest in expensive view lots and homes to have a sprawling subdivision and sewage plant in their back yard!

The noise alone generated from this project, along with the severe impact it will have on the air quality will most likely prompt my family to seriously consider relocating.

### **Devastating Impact on Wildlife**

The severe impact on the wildlife in this sensitive and fragile environment alone (once again acknowledged in the County's own initial study) should be enough to stop any further development in its tracks!

Over the past few months, my entire family has personally witnessed the destruction of the entire ecosystem that surrounded the small lake that was drained by the developer of the close to 800 homes going up just south and west of this project. This watering hole is (or was) just a couple of hundred yards away from the Valiano proposed project and was once a flourishing beautiful animal community comprised of large fish, frogs, white egrets, cranes, ducks, possibly geese, any kind of bird you could name including hawks and some special type of eagle, quail, roadrunners, etc., etc.

Many other larger animals used this reservoir for their water source including coyotes, bobcats, mountain lions, raccoons, and again, the list goes on and on. Several months back before the water was drained, my son and I were enjoying a walk in the area and we ran into a large male deer on his way to get a drink. But, no more, they're gone.

When we called the County to voice our concern, the response was vague and something about the developer doing "mitigation". No amount of mitigation can or will repair the damage that has already been done by the existing Harmony Grove development, nor will it repair the additional devastating and irreversible damage that will be done by the Valiano project!

### **PLEASE DO NOT LET THIS HAPPEN!!**

Unfortunately, over the past several years with the San Elijo project and the construction of Twin Oaks Valley Road just to the west and over the ridge from these projects, the impact to the surroundings has already been significant. The building of Twin Oaks Valley Road completely cut off the east west corridor for these larger animals such as the deer and many have been killed and continue to be killed trying to cross this 6-lane road. The fragile habitat in this area continues to be diminished in all directions by these major developments and the animals and birds, etc. are being constantly squeezed into a smaller and smaller area.

There are hawks and countless other species of birds, including possible a rare type of eagle, which call the avocado groves and surrounding area on and near this proposed project their home. One of the hawk's major nesting areas is located where the Valiano property, Harmony Grove development and our five acre parcel meet. No doubt, sadly most all of these beautiful birds will be wiped out with this development.

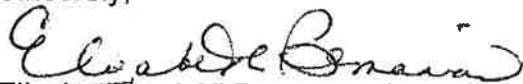
Once again, per the County's own study, the list is lengthy as to all the factors that will be significantly and probably irreversibly impacted by this decision. But I trust that the experts in all of these fields will confirm this information as they move forward with this study. I also trust that, as they did in the last meeting at the San Elijo fire station, the area's residents will continue to voice their own unique concerns just as to how this decision will impact their lives, health, etc.

Retaining the present zoning will still allow the developer to build its homes and just may give this fragile environment a slim chance to retain at least a fraction of the natural beauty and wildlife that's presently struggling to exist there.

We only have one chance to make this right. Even building 153 homes (on top of the 800 presently being built in Harmony Grove) will significantly impact the area, but we must do what we can to keep this impact to a minimum.

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elizabeth and Ali Bermanian".

Elizabeth and Ali Bermanian & Family  
575 Seeforever Drive (& adjoining parcel)  
Coronado Hills – San Marcos, CA 92078

Ehsan, Beth

Besprozvany

**From:** Randy B <endeavor2crb@yahoo.com>  
**Sent:** Friday, July 19, 2013 3:51 PM  
**To:** Ehsan, Beth  
**Subject:** Valiano Specific Plan: PDS2013-SP-13-001 (Environmental Impact Report)

Hello Ms. Ehsan:

I am writing you this letter in response to the Valiano Specific Plan: PDS2013-SP-13-001 after the public scoping meeting your department hosted on July 10, 2013.

First, I wanted to thank you and your team for conducting the meeting and soliciting feedback from the community on the proposed project and development plan.

In response to the Valiano project development of 362 homes on the 200+ acres, by Integral Communities. I believe that this project would introduce "high density" housing to the area and as such, I have the following concerns about the impact this development project will have to the environment and neighboring communities.

**ENVIRONMENTAL IMPACT CONCERN #1: Road and Pedestrian Traffic to neighboring Areas:** Since the primary access-way to the Valiano community will be through Interstate-15 through "Auto-Parkway" in the city of Escondido, and CA-78 through "Nordahl Rd." in the city of San Marcos. Both of these access-ways are adjacent to developed commercial shopping centers which exhibit significant traffic congestion. My concern is that with the integration of a community of significant size as the one proposed by the Valiano project, that traffic congestion would be significantly increased. The ramifications of this could lead to higher road maintenance costs, the possibility of higher accidents further affecting traffic, insurance costs personal and property damage and emergency service response times. Each of these will have negative impacts on the established community safety and security.

**ENVIRONMENTAL IMPACT CONCERN #2: Utilities Infrastructure Burden #1:** With the development of a housing community with such a high density as that proposed by the Valiano community, I am concerned with the environmental impact to the Electrical, Natural Gas energy, Water and Sewage systems such a community would place on the existing utilities infrastructure system.

**ENVIRONMENTAL IMPACT CONCERN #3: Utilities Infrastructure Burden #2:** I am concerned that the electrical utilities system demands could be significant enough to impact the regional electrical rates within 5-years after the completion of the development project. This concern is facilitated with the recent announcement that SDGE (the regional electric and gas utilities company) must raise energy costs with the closure of the San Onofre power generation facility, thereby reducing the local available power to the region.

**ENVIRONMENTAL IMPACT CONCERN #4: Utilities Infrastructure Burden #3:** Considering that the Valiano project density is one of the highest housing developments per unit area in neighboring area, my concerns is that the transmission systems and transformer systems will be inadequate to supply reliable power to all neighboring communities in addition to the Valiano project, reliably, with the systems as-is.

**ENVIRONMENTAL IMPACT CONCERN #5: Utilities Infrastructure Burden #4:** I am concerned that the existing natural gas distribution networks will be inadequate to support the demands of a community as dense as the one proposed by the Valiano project in conjunction with the demands of all neighboring houses within the area. This could lead to a lack of reliable natural gas distribution and increased costs for the existing customers.

Additionally, this could effect the health of individuals more sensitive to heat or cold by reducing the available resources and/or charging more for the resources.

ENVIRONMENTAL IMPACT CONCERN #6: Water Utilities System #1: I am concerned that the regional available water resources and the existing infrastructure are inadequate to support the demands of a community as dense as the one proposed by the Valiano project in conjunction with the demands of all neighboring houses within the area. These concerns are further compounded when considering that the regional area has been experiencing a drought, or low available water levels for many years, thus the additional of a community as dense as the Valiano project could cause water restrictions requiring the reduction or elimination of available water for farming (such as the adjacent Avacado fields and Orange groves in neighboring cities) and existing homestead landscaping, resulting in loss of crops and dead natural and artificial vegetation. This could lead to reduced property values and higher risk of fire danger for the area and neighboring communities.

ENVIRONMENTAL IMPACT CONCERN #7: Water Utilities System #2: I am concerned that the housing demands a community as dense as the one proposed by the Valiano project would reduce the regional water surplus and stores, that in the event of a wildfire or other natural disaster, water resources would be limited or unavailable to meet the needs of the disaster. This will have severely negative impacts on all neighboring areas to the development project that could ultimately lead to loss-of life.

ENVIRONMENTAL IMPACT CONCERN #8: Public and Environmental Health: As discussed in the public scoping meeting, a local sewage station would be built as part of the community. I am concerned that a station responsible for collecting the sewage to meet the needs of a community as dense as the proposed Valiano project could impact the human, wildlife and vegetative health of all surrounding areas. Since sewage waste can be significantly toxic to the environment, these environmental contaminants could cause foul odors or chemicals in the ground and air which could be absorbed into the bodies of people and wildlife thereby impacting their health.

ENVIRONMENTAL IMPACT CONCERN #9: Neighboring Real-Estate Values: I am concerned that having a local sewage waste station on and/or near the proposed Valiano development project would introduce contaminates into the neighboring air and ground making neighboring areas undesirable to live in, thereby decreasing property values for all surrounding areas within a 20-mile radius.

ENVIRONMENTAL IMPACT CONCERN #10: Neighboring Real-Estate Values: Considering that the Valiano project proposes a high density housing development (for the area) targeted to "Empty-Nesters" and "First-Time Move-ups" which targets low-income to middle-income individuals/families, and that all developed neighboring areas have housing densities significantly lower than that proposed by the Valiano project, the proposed project would cause a reduction in neighboring real-estate property values.

ENVIRONMENTAL IMPACT CONCERN #11: Environmental Runoff and Aesthetics: I am concerned that the high density housing development proposed by the Valiano project would reduce in size, or destroy, the Avacado farming fields on the proposed development land. This will significantly reduce the natural landscaping aesthetics of the area. Furthermore, it will impact the natural water run-off and watershed profiles for the environment which will impact the existing community by causing additional property damage during heavy rains or mud-slides.

In conclusion, I am concerned that the proposed Valiano project will introduce a "high-density" residential housing development that would increase traffic congestion to the surrounding area, put significant strain on the local and regional utilities, reduce local real-estate values, reduce the resources, reduce response times of emergency personnel to support the community, reduce property values, and degrade the natural aesthetics and environmental stability of the area. For these reasons, I do not believe the Valiano project should be permitted to develop the density of houses as proposed.

I ask that the Valiano project be restricted in size and scope to a housing community with the average house and land density as that of the neighboring community within the immediate 1-mile radius relative to the center of the proposed Valiano project plan so that the concerns outlined within this e-mail are mitigated and/or significantly reduced. As an example, I propose that the Valiano project be restricted to a density of approximately one house size of 2,200 sq,ft for every 1 - 2 acre's of land.

Additionally, I ask that zoning variance should not be permitted for the Valiano project.

I thank you for your support and help addressing my concerns about the proposed Valiano project.

Sincerely

Randy Besprozvanny  
PO Box 902  
San Marcos, CA 92079  
(760) 708-6025  
[endeavor2crb@yahoo.com](mailto:endeavor2crb@yahoo.com)

**From:** Eveline Bustillos <eveline.bustillos@gmail.com>  
**Sent:** Thursday, July 18, 2013 12:28 PM  
**To:** Ehsan, Beth  
**Cc:** Loy, Maggie A  
**Subject:** Comments on the Valiano / Integral Communities project

To: The County of San Diego – Planning & Development Services  
Re: Valiano Project by Integral Communities

My family and I have serious health and safety concerns in regards to the proposed Valiano/Integral Communities project. Several years ago, we moved to the Elfin Forest community specifically to enjoy clean air and quiet open spaces for outdoor recreation and quality of life. The reality is that in addition to the already approved 750+ houses coming to the community due to the Harmony Grove Village project, this proposed Valiano project would mean another 326 houses or an additional 40%+ more noise pollution and carbon emissions pollution for my family to hear and breathe.

Besides the obvious negative visual impact and loss of recreational opportunities, the additional traffic is truly scary and dangerous. At this point in time, we do not yet know the ultimate degree of impact Valiano/Integral Communities will have on our daily activities. We can, however, estimate the impact based on the increased danger since work has begun on the neighboring project of Harmony Grove Village. Since the building of the Harmony Grove Village project has begun our family has had several dangerous close calls. On 2 separate occasions one of us was almost run over by a speeding vehicle as we were crossing Elfin Forest Road while riding our 4 horses. Additionally, whenever one of us now attempts to cross the road for walking our dogs or for our daily jog, it is now increasingly difficult to cross in between the increased traffic.

By keeping with the new, just recently approved, General Plan the Valiano developers would already be allowed to build 1 structure per 1 or 2 acres. Frankly, that is bad enough considering how busy and dangerous the current traffic already is! This increased danger results from just the Harmony Grove Village construction workers who normally only commute to and from work. If 326 houses or approximately 652 additional vehicles, in addition to the already 750+ Harmony Grove Village houses or approximately 1500+ vehicles, for a total of approximately 2152 additional vehicles, traffic would run all day long on Elfin Forest and Harmony Grove Road. Allowing this additional 326 houses to be built is truly scary with already 750+ being built in one of the last rural communities West of I-15. PLEASE do not allow the destruction of our beloved community...

Thank you,

Eveline F. Bustillos  
20555 Fortuna Del Sur  
Elfin Forest, CA 92029  
760.471.6355



Eveline F. Bustillos, Realtor®

**858-354-0600**

[www.EvelineBustillos.com](http://www.EvelineBustillos.com)

[Eveline@ColdwellBanker.com](mailto:Eveline@ColdwellBanker.com)

DRE #01117321

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MARK WARDLAW  
Director

DARREN GRETLER  
Assistant Director

County of San Diego  
PLANNING & DEVELOPMENT SERVICES

5510 OVERLAND AVENUE, SUITE 110, SAN DIEGO, CALIFORNIA 92123  
INFORMATION (858) 694-2960  
TOLL FREE (800) 411-0017  
www.sdcounty.ca.gov/pds

VALIANO SPECIFIC PLAN; PDS2013-SP-13-001  
JULY 10, 2013, ELFIN FOREST FIRE STATION  
PUBLIC SCOPING MEETING COMMENT SHEET

My husband and I had bought this property in the 70's. We were heavily involved in the project that is going on now. I would like it to remain the 1 to 2 acres sites. This area is a community in itself because of the way that the cloud cover hangs and noise carriers. Green house affects including air quality, and the year around creek, large animals and rural character. The traffic should be based on roads already existing including future sprinter every 15 minutes and the development already going on.

Do not count on roads that are planned for the future unless this development pays for them.

Betty Jo Cavender 7/19/13  
Signature, Date

Betty Jo Cavender  
Print Name

2820 Cordrey Dr.  
Address

Escondido, CA 92029  
City, State, Zip Code

5510 Overland Avenue, STE 310

San Diego, CA 92123

Phone#: (858) 694-3103

Fax #: (858) 694-2555

e-mail: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

NOP COMMENTS MUST BE RECEIVED BY 4:00 PM July 19, 2013



MARK WARDLAW  
Director

DARREN GRETLER  
Assistant Director

County of San Diego  
PLANNING & DEVELOPMENT SERVICES

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VALIANO SPECIFIC PLAN; PDS2013-SP-13-001  
JULY 10, 2013, ELFIN FOREST FIRE STATION  
PUBLIC SCOPING MEETING COMMENT SHEET

I own animals that are already affected by the construction going on. The construction runs 6 days a week and they continue into evening hours. More coyotes in the neighborhood ~~at~~ can be seen about anytime. I am concerned about my ~~own~~ animals well being.

Betty Jo Cavender 7/19/13  
Signature, Date

Betty Jo Cavender  
Print Name

2820 Cordrey Dr.  
Address

Escondido, CA 92029  
City, State, Zip Code

5510 Overland Avenue, STE 310

San Diego, CA 92123

Phone#: (858) 694-3103

Fax #: (858) 694-2555

e-mail: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

NOP COMMENTS MUST BE RECEIVED BY 4:00 PM July 19, 2013



MARK WARDLAW  
Director

DARREN GRETLER  
Assistant Director

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VALIANO SPECIFIC PLAN; PDS2013-SP-13-001  
JULY 10, 2013, ELFIN FOREST FIRE STATION  
PUBLIC SCOPING MEETING COMMENT SHEET

I am concerned about changing the general plan. I would like to preserve the rural character and the community character. There are many safety issues involved not only for vehicles but also people walking dogs and riding bikes and horses. This area is a big draw for bicycles. People come from all over to ride out here. Green house effects must be looked at. Response time for police and fire. 100 year flood plain. Wanting large animals to remain.

 7/19/13  
Signature, Date

DIANA CAVER  
Print Name

2848 CORDREY DRIVE  
Address

Escondido CA 92029  
City, State, Zip Code

5510 Overland Avenue, STE 310  
San Diego, CA 92123

Phone#: (858) 694-3103

Fax #: (858) 694-2555

e-mail: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

NOP COMMENTS MUST BE RECEIVED BY 4:00 PM **July 19, 2013**

**Ehsan, Beth**

Davis/  
Deaver

**From:** J Arsivaud [j.arsivaud@gmail.com]  
**Sent:** Monday, July 08, 2013 2:16 PM  
**To:** Ehsan, Beth  
**Subject:** Fwd: E-ALERT: Meeting Regarding Another Proposed Development in Harmony Grove / Eden Valley

Hello Beth,

In advance of the meeting, here is an early comment from a neighboring property owner. See you Wednesday,

Jacqueline  
760-855-0444

----- Forwarded message -----

**From:** <[susan1966@cox.net](mailto:susan1966@cox.net)>  
**Date:** Sat, Jul 6, 2013 at 1:47 PM  
**Subject:** Re: E-ALERT: Meeting Regarding Another Proposed Development in Harmony Grove / Eden Valley  
**To:** Elfin Forest Harmony Grove Town Council <[efhgtc@gmail.com](mailto:efhgtc@gmail.com)>

We wanted to come to the meeting, but we can't due to a prior commitment with work.

We anticipate that traffic will be a problem and they won't be able to mitigate in a way that isn't a MAJOR problem for all of us.

We represent the corner of Kauana Loa Drive and Country Club Drive.

Feel free to share our opinion at the meeting, if you think it will help.

Sincerely,  
Kevin and Susan Davis and LaVon Deaver

**From:** [Elfin Forest Harmony Grove Town Council](#)  
**Sent:** Friday, July 05, 2013 4:17 PM  
**To:** undisclosed-recipients:  
**Subject:** E-ALERT: Meeting Regarding Another Proposed Development in Harmony Grove / Eden Valley

**SUBJECT:** County to hold important meeting on July 10 at EFHG Fire Station re Eden Valley and Harmony Grove housing development.

The County is holding an EIR Scoping Meeting regarding the Valiano development project which is proposed in the Eden Valley and Harmony Grove communities. This is ANOTHER development that is being proposed adjacent to Harmony Grove Village, which would bring the total number of

**Ehsan, Beth**

Erforth

**From:** Jean-Francois Erforth <jeanoerforth@gmail.com>  
**Sent:** Thursday, July 18, 2013 11:47 PM  
**To:** Ehsan, Beth  
**Subject:** EIR Valliano Development  
**Attachments:** Keep rural community character of the area

Jean-Francois Erforth

7753 Camino Sereno

Elfin Forest, CA 92029

To: Beth Ehsan at [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

7/18/2014

Regards: EIR Valliano Development

To Whom It May Concern:

Please see below my comments on the proposed project.

Elfin Forest/Harmony Grove is a community rural in character. Everybody who lives here lives here for that reason. It should stay that way. We have no gated communities and the lots we live on are minimum one or two acres. Many residents keep large animals on their properties.

There is no reason to agree to an increase in density from the current and recently approved General Plan Update. The plan was developed over the last 10 years with lot of community input. All landowners had their chance of input over those 10 years. They should respect the rules now. The attempt to maximize profits of a few should not impact the lives of so many.

The visual impact from the Elfin Forest recreational reserve will be further increased by the proposed development in the area. The Elfin Forest recreational reserve is used by many people to enjoy the views of open spaces and wildlife in the area and not to look at massive developments.

Horse facilities in a development of the proposed density do not work and are just lip service. Just look at San Elijo Hills west of Elfin Forest. No horse rider ever uses the trails or staging area. They are not useable for horses.

I'm very concerned with the increase of traffic in our area. With the decision of Escondido not to extend Citrocado Pkwy but to develop Harmony Grove Village anyway we will see a huge increase in traffic on the surrounding roads especially Country Club and Harmony Grove/Elfin Forest Lane. This will have a serious impact on the safety of our roads. All roads will be more dangerous for our children, families, bicyclist, and the wildlife.

There are very few open spaces west of I-15 left. We owe it to the generations to come to leave some open spaces and chaparral in this area for the existing wildlife and for everybody to enjoy. The north county chaparral is one of the most biodiverse area in the entire country.

The proposed development has not enough fire exit roads, it will only increase the already high risk of getting caught by fire. In case of an evacuation situation it will be more difficult to get in and out of the area.

I'm very concerned about an increased danger for our children trough increased traffic, especially through truck and construction traffic.

Movement of the proposed amount of dirt is killing the existing wildlife and plants (chaparral) Once the existing nature is destroyed it cannot be recreated. See what happens in Harmony Grove. The construction traffic is massive throughout the area and all nature is destroyed.

The proposed change of the landscape in a 100-year flood zone is very concerning to all the residents living in the area. Water will find it's way through the area and many parcels below will be affected by the proposed changes of the landscape. The increased amount of roofs will increase the amount of floodwater going down stream. The Escondido Creek can already become a rolling river on rainy days. This would get worse.

In closing, I would like to state that all the land owners in the Elfin Forest/Harmony Grove area should play by the same rules. The rules we agreed to in the general plan for our land.

Thank you for your attention in regards to my concerns about this project.

Jean-Francois Erforth

Galvan

**Lauro and Alma Galvan**  
2942 Mt Whitney Rd,  
Escondido Ca, 92029

7-19-2013

**Dear Mr. Warlaw,**

**We appreciate the opportunity to comment on the Public Scoping Meeting for the Valiano/Eden Hills Project. (PDS2013-SP-13-001)**

### **Habitat**

Eden Valley has a beautiful landscape especially where the native California Red oaks exist. There are some specimens that are over 200 years old. California spends thousands of dollars to protect native endangered plants. The red oaks grow in valleys and wetlands where there is water present. Our question is... How will you make sure no damage comes to existing oak trees?

### **Air Quality**

As you may see by our address we are in front of this development. Since the Valley project started our son has developed significant allergies. The amount of dust and silica sand from the valley project is tremendous. Visible to us not only in our son's health, but when we wash our cars the next day you are able to see the huge indicator of just how much dust is in our air. Our concern is not just for our son, but there are many elderly in our valley and having bad air for long periods of time bring serious health consequences in the future. How do you plan in insuring that the air quality will be contained to healthy levels?

Lauro Galvan



Alma Galvan





Beth Ehsan  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

**Re: PDS13-SP-13-001. LOG NO. ER-13-08-002; VALIANO**

Dear Ms. Ehsan:

Thank you for the opportunity to comment of the Notice Of Preparation for the EIR of the Valiano project. My comments are listed below.

1. This would be the first gated community in the area and the potential impacts to the ability of existing residents to integrate with the new residents should be studied, as well as impact of diluting the collective voice of the community far into the future.
2. Project density far exceeds that in current GP and the impact on the urban/rural balance built into the local planning model, that is, the Village development pattern which encompasses EF, HG, and EV, should be studied and mitigated.
3. Granting of this GP amendment sets a precedent that could lead to the fragmentation and eventual loss of this historic, 100 year old rural community if more property owners decide to petition for similar amendments and subdivide their large lots as well; this potential impact should be studied.
4. Traffic analyses should include trips and alterations to current roadways (including the recently downgraded Country Club Drive with reduced [25 mph] speed limit) associated with the 742 home-with-commercial center Village development, as this will be existing, not "proposed" by the time the Valiano project is built, and should take into account the fact that the extension to Citracado Parkway planned by the City of Escondido has been indefinitely delayed.
5. Impacts of nearby high-density development with ongoing noise and traffic on income of existing residents with outdoor businesses such as equestrian ranches should be studied.

*Possible mitigation:* Build out according to current GP and Community plan; Build more rural homesites and fewer urban homesites; Route some traffic into San Marcos to reduce local burden on small rural community; Position most dense development in a more central location to reduce impact on existing residents; Choose name for community that integrates with the character of Eden Valley homes, ie, Eden Hills; Add local community amenities (equestrian staging area benefits distant public and is not likely to be used by

surrounding equestrian properties) such as a parkland with a “creekwalk” and fishing (stock and maintain sport fish in Country Club Tributary).

**Comments specific to Neighborhood 5 (in Harmony Grove):**

6. The impact of raising nearly 100 densely spaced, 2-story urban houses 15 foot above the floodplain (rooftops would be 50 ft above current grade) that will be prominently visible from the one main roadway through this historic, 100-year-old rural community of Harmony Grove should be studied.
7. Raising nearly 100 homes out of the floodplain will increase footprint of the remaining floodplain, increasing the potential for significant drainage issues that should be studied.
8. Lighting in and on raised houses causes significantly worse visual impact on surrounding lower-level neighbors, therefore any analysis of light pollution effects should take this positional deficit into account.
9. As with lighting impacts, noise impacts of nearly 100 raised homes relative to existing community neighbors should be studied with this positional deficit in mind.
10. Part of this neighborhood is within CSA 107, and a second fire station is being built very close to this development (for the Village project); the impact of annexing the entire project into this district should be studied.
11. Neighborhood 5 has only one ingress/egress that is not shared with the main community exit in case of emergencies and whether the current design may pose a significant safety risk should be studied.

*Possible mitigation:* Build only one-story homes and space homes further apart; Set homes further back from Country Club Drive, with a tree-lined linear park and trail in front along the roadway; Add a southerly or westerly access for emergency evacuations; Widen or deepen the creek to accommodate larger drainage flows, but retain the natural sides to reduce impacts on riparian ecosystem; Design trail system to double as emergency access route.

**Comments specific to the proposed sewage treatment plant:**

12. Impacts on Escondido Creek tributary and fragile riparian ecosystem due to proximity to the intensive use caused by a sewage treatment plant should be studied.
13. The proposed sewage treatment plant is located at the boundary of the project and is surrounded on three sides by Harmony Grove residents. Whether this proximity to the sewage treatment plant could adversely affect property values of existing residents should be studied and mitigated.

14. The Valiano HOA will be operating and maintaining this plant, there should be adequate ongoing bonding required to insure the public against failures or unforeseen problems. In addition, the public should have some guarantees that there will be continuous monitoring of sewage treatment and that safety protocols regarding bacterial pathogen levels and hazardous chemical storage and handling are being strictly followed, and that HOA employees have proper experience and training.
15. The **cumulative impact** of multiple open sewage containment areas from at least three separate sewage treatment facilities (HARRE, HG Village, and Valiano) on one small area (less than 4 square miles) in this rural community should be studied to ensure that the environment and the neighbors will not be unduly hindered.

*Possible mitigation:* Move the sewage treatment plant to a more central location within the development to reduce the adverse impacts on existing residents and the riparian environment; Build fewer but larger homesites in this neighborhood; Create public parkland along the creek in the floodplain to enhance nearby property values and offset possible negative effects of sewage treatment plant; Use individual septic systems or move sewer services off site, perhaps contracted from a neighboring water district.

Sincerely,

Mid Hoppenrath  
2640 Harmony Heights Rd,  
Harmony Grove, CA 92029

**From:** Natasha Kay [NatashaK@Wordsmart.com]  
**Sent:** Friday, July 12, 2013 11:15 AM  
**To:** Ehsan, Beth  
**Subject:** Harmony Grove meeting comments

Beth,

The Harmony Grove Village project is already affecting everyone here in all of the ways listed below and with another development will be even worse, many of us may be forced to move.

The issues that my husband and I are extremely concerned about are as follows:

- the Animals/wildlife (coyotes, deer, bobcats, small animals, birds of prey, etc.) will be further driven away and out into the roads and other areas, they already have a very small space to live and thrive. The owls and other birds of prey have to have a certain amount of nesting areas and will be adversely affected.
- traffic is already soo bad that our "rural" area is like living by a freeway. This will be compounded times 10 by HG Village and with this new development will be even worse. This will eventually mean widening the roads further affecting all of us negatively. The point brought up at the meeting was that the traffic study should not only include what the traffic is now but what it will be with an additional 1500 from HGV and then at least 500 more from the new project. That's at the very least 2000 more cars driving in the area NOT including the construction traffic that we will all have to live with for the next 5-10 years of the projects being completed. The traffic study should include a PROJECTED volume of cars after both are in AND the construction traffic in the meantime.
- night skies are already polluted and again, with HG village it will be like living anywhere in the city and this development will make it even worse for star gazing and astronomy.
- air quality will continue to get worse, and we live right on the road.
- noise which again we already have too much.
- drainage pollution and creek will be even dirtier and will affect the wildlife and water quality. We are on the creek and live off of a well which will be polluted by runoff and pollution from these 2 developments.
- rural character has been all but lost with HG village and would become even worse, destroying what was left of the "rural character" of the area. From what we understand there was a plan in place in order to keep the area "rural" and was in the general plan for EFHG.
- general increased density.
- crime and vandalism will increase with all these new homes.
- the "visual aesthetic" is not only what is seen from the road but what We see as residents of the area and it is already being ruined by HG village.
- emergency response.
- the flood plain issue is an issue since we live right by the creek. When it rains hard it already comes dangerously close to those of us on the creek.

We agree that giving us 1 week out of 30 days was unfair to voice our concern. We hope very much that all of the residents of EFHG will be heard and that you will consider very carefully the ramifications of adding another development to this area that we all love and call home.

Thank you,

Natasha Kay-Hazou and Derek Hazou  
9237 Harmony grove Road  
Escondido, CA 92029  
619-307-9446  
[natashak@wordsmart.com](mailto:natashak@wordsmart.com)



**Please consider the environment before printing this e-mail**

**Ehsan, Beth**

Laderman A

**From:** Andy Laderman <aladerman@cox.net>  
**Sent:** Wednesday, July 17, 2013 3:56 PM  
**To:** Ehsan, Beth  
**Cc:** Loy, Maggie A; 'Phyllis Laderman'  
**Subject:** Comments regarding NOP for EIR for Valiano (PDS2013-SP-13-001  
**Attachments:** PDS13-SP-13-001 NOP Comments Laderman 071513.pdf

Beth:  
Please find attached a documents containing our comments on the Notice of Preparation for the Environmental Impact Report for Valiano. This documents includes and expands on my verbal comments at the community meeting held on July 10, 2013. Thank you again for facilitating that meeting. Please do not hesitate to contact me if you have need clarification of any of our comments or have any questions.

Sincerely,  
Andrew & Phyllis Laderman  
2710 Surrey Lane,  
Escondido, CA 92029  
[aladerman@cox.net](mailto:aladerman@cox.net)  
Mobile: 760-580-5219

July 16, 2013

Mark Wardlaw, Director  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS13-SP-13-001. LOG NO. ER-13-08-002; VALIANO

Dear Mr. Wardlaw:

As long term residents of Eden Valley we appreciate the opportunity to comment on the Notice of Preparation for the EIR of the Valiano project. We also appreciated County Staff facilitating a Public Scoping Meeting for our community last week.

We are residents of 2710 Surrey Lane in Eden Valley. We have owned the property for over 29 years; we have raised our family there as well as several horses. We are very concerned about the devastating impact the Valiano development and requisite general plan amendments could have on our environment and lifestyle if it is approved in its current form. This would be in addition to the environment impacts we will suffer from the completion of the 742 home Harmony Grove Village project. Below we have detailed what we feel are the most significant potential impacts and request that the EIR address all of our comments and that the applicant provide either plan modifications or mitigations to insure that our environment and lifestyle are not detrimentally and irreversibly impacted.

1. We currently have splendid vistas of the open natural landscape and hills to the west of our property that will be impacted by this development. Given the amount of "cut and fill" that is being proposed the topography of the valley will be altered beyond all recognition. How does the applicant plan to maintain our scenic vistas?
2. I am an amateur astronomer. We currently rely on the dark skies of the valley to use our 9 inch Schmidt-Cassegrain telescope to observe planets, stars and other celestial objects. The addition of 362 residents together with associated residential, street, and vehicle lights in Eden Valley will result in a marked increase in light pollution. How does the applicant plan to maintain our dark skies?
3. We have a pool and deck on the east side of our property that is less than 50 feet from the southbound lane of Country Club Drive. The traffic on Country Club drive has already increased as result of construction activity at Harmony

Grove Village. The completion of 742 homes at Harmony Grove Village as well as an additional 362 homes at Valiano will result in a considerable increase in the traffic on Country Club Drive. This situation will be further aggravated by the indefinite delay of the completion of the Citracado Parkway extension by the City of Escondido as this was intended to mitigate some of the increased Country Club Drive traffic resulting from Harmony Grove Village. When using our pool and deck we will be subjected to multiple environmental impacts due to the increased traffic. These include increased noise pollution, poorer air quality and increased greenhouse gas emissions. How does the applicant plan to mitigate the consequences of the increased traffic so that we are still able to use our pool and deck without being concerned for our health and safety?

4. We have a barn owl box on our property and have had nesting barn owls there every summer since 2005. These afford us a very ecologically conscious approach to rodent management at our horse barn as well as add to the rural ambiance that we and our neighbors enjoy. Barn owls need a minimum of 500 acres of open habitat to catch sufficient prey during their nocturnal hunts. Valiano will remove over 200 acres of suitable habitat for the barn owls. How does the applicant propose to maintain enough hunting habitat to sustain the valley's migratory barn owl population?
5. During the winter months an inversion layer frequently forms in Eden Valley as a result of the natural topography. During these times the nighttime temperature in the valley frequently drops 10 to 20 degrees below the temperature on the surrounding hills. This results in air sinking into the valley and trapping any air borne pollutants for several hours. The increase in greenhouse gases and other airborne pollutants as a result of Valiano's increased traffic, home heating and outdoor heat sources (bbqs, fireplaces, etc.) could severely impact air quality during these times resulting in periods of potentially unhealthy air for the valley's residents. How does the applicant plan to ensure that this does not pose a threat to our health?
6. The valley has a high water table and several artesian springs. Several areas of the valley become water logged in a typical winter. For example, we have installed a French drain adjacent to our horse arena to mitigate one of the springs. The vast alteration of the valley's topography by the extensive cut and fill proposed by the applicant could alter existing drainage paths, artesian springs and natural floodplains. How does the applicant propose to ensure that we are not inundated with flood water as a result of their alterations of the valley's topography?
7. Eden Valley is designated a traffic calmed neighborhood. When exiting Surrey Lane onto Country Club Drive with a horse trailer we rely on this designation and the resultant lower traffic speed to assist us in making a safe exit given the limited line of sight. With the expected significant increase in



July 16, 2013

traffic how will the applicant ensure we can still make a safe exit onto Country Club Drive?

8. The traffic on Country Club Drive will also be impacted by the heavy trucks that will be making frequent trips to remove waste from the proposed on-site sewage treatment plant at Valiano. How will the applicant mitigate the environment impacts of these trucks and their contents, including noise pollution, air quality, odor, greenhouse gas emissions and the impact on the area's traffic calmed neighborhood designation? What are the contingency plans for addressing any vehicle spills and accidents while carrying this hazardous waste through our residential neighborhood?
9. There are many potential environmental impacts of locating a sewage treatment plant in Eden Valley. These include odor, visual impact, traffic (as mentioned above), air quality, hazardous waste, potential health impacts during malfunctions (i.e. soil or ground water contamination). How does the applicant intend to mitigate each of these concerns?

In summary, our community has worked diligently with the County over the last decade to evolve a General Plan that recognizes and preserves our rural lifestyle through well thought out land use planning and zoning. The intent was to avoid just the sort of environmental impacts that will occur if the applicant is granted a highly impactful General Plan Amendment to develop Valiano as proposed.

We appreciate your review of our comments and consideration of our concerns.

Sincerely,

Andrew and Phyllis Laderman  
2710 Surrey Lane,  
Escondido, CA 92129



MARK WARDLAW  
Director

County of San Diego  
PLANNING & DEVELOPMENT SERVICES

DARREN GRETLER  
Assistant Director

5510 OVERLAND AVENUE, SUITE 110, SAN DIEGO, CALIFORNIA 92123  
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www.sdcounty.ca.gov/pds

VALIANO SPECIFIC PLAN; PDS2013-SP-13-001  
JULY 10, 2013, ELFIN FOREST FIRE STATION  
PUBLIC SCOPING MEETING COMMENT SHEET

Double tracking of trains ~ Every 15 minutes  
no \$ for cutracado through rd. to Palomar Hospital  
new 700 home project - added traffic  
Flood plane project #5 aqueduct drainage  
negative effect on existing livestock etc.  
include buildout traffic effect  
Fire access 2 - Primary & Secondary

Jo Anne Lesser 7/15/13  
Signature, Date

Jo-Anne Lesser  
Print Name

2462 Live Oak Rd  
Address

Escondido, CA 92029  
City, State, Zip Code

5510 Overland Avenue, STE 310  
San Diego, CA 92123  
Phone#: (858) 694-3103  
Fax #: (858) 694-2555  
e-mail: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

NOP COMMENTS MUST BE RECEIVED BY 4:00 PM **July 19, 2013**



MARK WARDLAW  
Director

**County of San Diego**  
**PLANNING & DEVELOPMENT SERVICES**

DARREN GRETLER  
Assistant Director

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**VALIANO SPECIFIC PLAN; PDS2013-SP-13-001**  
**JULY 10, 2013, ELFIN FOREST FIRE STATION**  
**PUBLIC SCOPING MEETING COMMENT SHEET**

*See Attached Comments / Concerns*

*Bruce Marshburn* *7-9-13*

Signature, Date

*Bruce Marshburn*

Print Name

*2738 Harmony Heights Rd*

Address

*Escondido CA 92029*

City, State, Zip Code

5510 Overland Avenue, STE 310

San Diego, CA 92123

Phone#: (858) 694-3103

Fax #(858) 694-2555

e-mail: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

**NOP COMMENTS MUST BE RECEIVED BY 4:00 PM July 19, 2013**

Submitted EIR  
44 of 84 in the Report  
Impact

Bruce MARSHBURN  
273 Harmony Heights Rd Esc  
Significant potentially

Habitat - home to deer & mtn lions - already being effected by Harmony Village. Birds in Valley Ducks, Quail, hawks, raptors & Stephens Kangaroo Rat Area & natchatches & golden Eagle  
① Valley consists of stream running year round - changed to this valley and the street severe and runoff from concrete and asphalt for 25, 50 & 100 yr flood plan

Historic sites - the old Ranch house & California barn from the Rawhide Ranch - built around the early part of the 20th Century.

① Indian sites are known to be thru out the Valley.

### Sewage treatment plants

2 plants about a 1/2 mile apart in Valley - which will be down wind of Valley Residents and truck traffic added to Valley roads hauling solid waste out.

① Additional lights added to Valley by the plants & smell overburdened local roads.

② policy, CM-10.2.1 Require all proposed new development to use septic systems with one septic sys. per dwelling

① this project homes going on 2 acre lots - they need zoning changes

② gated community needs zoning change

③ zone changes for wildlife

### Water

What existing water provided to this project - going to lose

Mark Wardlaw, Director  
Planning and Development Services  
County of San Diego  
5510 Overland Drive  
San Diego, CA. 92123

Mashburn

Re: VALIANO PROJECT PDS2013-SP-13-001

Dear Mr. Wardlaw,

I appreciate the opportunity to comment on the Notice of Preparation for the Environmental Impact Report for Valiano/Eden Hills Project. My comments and concerns follow.

**AESTHETICS:** As a 30-year resident of Eden Valley/Harmony Grove, I have witnessed the destruction of nearby native habitat through large development; i.e., Olivenhain, San Elijo Hills, and the current Harmony Grove Village. Once this native habitat is destroyed it cannot be replicated. In addition, the razed land is then populated with private residences who traditionally install UN-native habitats on their personal properties which further stresses the limited natural Southern California resources such as water and power. How will the Valiano Project protect the aesthetics of the native habitat with proposals to grade 700,000 cubic yards of soil? What remedial attempts can substitute the existing visual character of this region?

The proposed "gated community" is anathema to the low density, rural agricultural flow and character of the valley. How can a "gated community" be integrated into the current environment without totally disrupting the existing atmosphere and rural texture?

The proposed project cannot keep from adversely affecting the nighttime views of the area. In addition to the required outdoor lighting for neighborhoods as densely populated as these, there will be the numerous automobile trips during the evening hours that will further encroach on the nighttime views. What proposals or guarantees can a developer offer to assure the current dark nighttime views can be maintained?

**AGRICULTURE AND FORESTY RESOURCES:** As currently zoned, we residence enjoy the freedom to have and to tolerate one another's agricultural endeavors. Urbanization of this region will result with new residents who will most likely not be tolerant of the dirt, smells, and inconveniences of some of activities associated with agricultural environments. This will lead to complaints and new restrictions on our existing zoning. What assurances can the developer present to prevent the future disputes related to integrating agricultural with urban environments?

**AIR QUALITY:** We residents are currently suffering through adversely affected air quality of the Harmony Village blasting/earth moving/grading; it is becoming intolerable. Complaints must be investigated, but in the interim the residents are left to endure the daily nuisance and discomforts for months. How can the developer prevent the total disturbance in the current residents' daily lives during construction?

The proposed placement of a sewage treatment plant "down wind" of the valley is UNACCEPTABLE! It is proposed that this treatment facility be placed at the furthest corner of the neighborhoods, thus shielding the residents of the development from the *objectionable*—dare we call it what it is—human waste of their own making!! If they are to install a human waste sewage treatment plant, let it be in the very center of their own development and not subject the long-time residents to suffer with smelling someone else refuse! We residents each must install and maintain our own private septic systems and don't subject our neighbors to dealing with the resulting offensive smells! This proposed project **MUST COMPLY WITH CURRENT ZONING BY THE USE OF PRIVATE SEPTIC SYSTEMS.**

**BIOLOGICAL RESOURCES:** As I have stated, once the native habitat is destroyed, the dependent ecological systems and wildlife will be gone forever....no chance of mitigating their loss! This region is home to various wetlands, sensitive native plant species, animal species, birds, etc. The residents appreciate and protect this environment. How does the developer intend to prevent the destruction of this region's ecological systems including the sensitive wetlands, animal species, birds, raptors, migratory fowl?

**CULTURAL RESOURCES:** As a region which has vast stretches of land that have historically remained undisturbed, many culturally significant areas and historical sites exist. What can the developer propose that would justify the destruction of these irreplaceable resources?

**GEOLOGY AND SOILS:** The proposed grading will disrupt the natural riparian flow in the valley and completely decimate thousands of yards of topsoil. These are issues which do not stand the test of time. Heavy rainy season, though rare, are notorious for finding the weaknesses which are unforeseen –or ignored—during vast land development. By the time this

should occur, the developer has been long gone and the residents are left to *mitigate* their losses. Losing native topsoil is unacceptable. Have we learned nothing since the 1930s? Topsoil is an intricate ecosystem developed slowly over time and cannot be *mitigated* into existence. What does the developer propose to these issues of the soil?

**GREENHOUSE GAS EMISSIONS:** There is not a shred of doubt that adding this much urbanization to a region bordered on two sides with hills will trap and increase greenhouse gasses for all residents. **THIS IS NOT ACCEPTABLE.** What can possibly mitigate an increase in this much greenhouse gas to the residents and environment?

**HAZARDS AND HAZARDOUS MATERIALS:** My concern involves the protracted development of this proposal. During this lengthy blasting, grading, and earth moving, we residents must continue to conduct our daily lives and breathe the created contaminants for however long it takes. We are currently enduring the Harmony Village development and having to file complaints to assure compliance. What can this developer promise that will assure the residents we will not be adversely affected from the hazardous materials during development?

**HYDROLOGY AND WATER QUALITY:** As a 30-year resident, I have observed the varied weather patterns and their effects on the watershed in this region. Replacing the natural, permeable floor of this valley will undoubtedly result in potential flooding issues. Of significance will be the rearrangement of the topography to mitigate the existing flood plans in order to construct new homes. By so doing, the surrounding properties will be adversely affected during heavy rain seasons. The paving of so much of this region will result in a sharp increase in polluted water/rain runoff, which will drain downstream into the Escondido Creek. How does the developer plan to prevent the occurrence of polluted runoff from reaching Escondido Creek? How much liability is the developer willing to bear with regard to flooding as a result of restructuring the valley topography?

**LAND USE AND PLANNING:** This proposal is in exact opposition to the existing community. It does not enhance or preserve the rural character of the area. The current zoning—developed by the existing community and approved by the Board of Supervisors—requires low-density development. In contrast to the General Plan policy to limit grading, this project dramatically alters the physical characteristic of the area. Can the developer defend the radical grading plans in light of the General Plan? How does the developer intend to abide by the Rural and Semi-rural Land Use Designations? How does the developer explain this as an integrated development when it is proposed to be gated and separate from the community?

**NOISE:** This valley is very quiet; we enjoy the noises of wildlife on a daily basis. The natural flow of this valley magnifies noises to the upward gradient of the surrounding elevations. This development is planned for the lowest levels of the valley, which will result vastly increased daily noises in all areas. The traffic will substantially increase and negatively affect the quiet nature of the valley...this **CANNOT BE MEDIATED!** Our very lifestyle—the lifestyle we chose by moving here—will be irrevocably destroyed! What can the developer offer as any excuse for this destruction?

**POPULATION AND HOUSING:** The *Elfin Forest and Harmony Grove San Dieguito Community Plan* adopted 8/3/2011 sets out density guidelines for this region. The proposed project dramatically violates these guidelines. How can this be expected to be acceptable to the current residents of this area?

**PUBLIC SERVICES:** This area has no undeviating access that accommodates quick emergency/safety response times. Does the developer have any intentions to provide supporting access to this development?

**RECREATION:** This development will dramatically increase the population of this region. This urbanized increase in population brings with it much recreation and activity which permanently alters the rhythm the community from quiet and rural to bustling, noisy, and disruptive to a rural community.

**TRANSPORTATION AND TRAFFIC:** The unavoidable result of 362 new homes added to an area accessible only by two-lane roads is disastrous for the current residents. The noise, pollution, safety concerns, and aesthetic disruption are unacceptable. This area is designated as a *Traffic Calmed Neighborhood*. Nothing about this development will enhance or maintain this designation; rather, it will destroy it! How does the developer hope to mitigate the concerns over this issue—other than widening roads—which only further exacerbates the problems? What are the specific full build-out projections of this project in conjunction with the Harmony Village estimates for increased traffic impacts to the community? What are the primary and secondary traffic impacts? What are the build-out occupied traffic analyses?

**UTILITIES AND SERVICE SYSTEMS:** The *Elfin Forest and Harmony Grove San Dieguito Community Plan* requires individual septic systems; this project proposes a package sewage treatment system. This is intolerable to the residents of the community. The potential for malodorous smells and the disruption to the character of the community is unacceptable and a deviation from the approved *Elfin Forest and Harmony Grove San Dieguito Community Plan*. I have grave personal concerns for this proposal, in that the site for this “package sewage treatment” facility is to be situated at the intersection of my easement and Country Club Drive—directly down-wind from my home. Also of significance to me is

the fact that the proposed site is at the furthestmost corner of the planned development; thus, resulting in the least possible effect on the newly constructed neighborhoods. Ironically, the offensive odors of this sewage facility will waft *outside* their own neighborhood to be tolerated by us, the current and long-time residents who must utilize private septic systems. Also undesirable is the process of removing the solid waste for disposal. This must be accomplished by trucks, which further exacerbates the negative traffic issues. Additionally, at the time of transferring the solid waste from the holding tanks to the trucks the odors will intensify, accentuating the undesirable smells. What can possible mitigate these issues?

In conclusion, the major concerns I request to be investigated would be:

- 1) the destruction of native habitat (trees, waterways, wildlife, birds)
- 2) requirement of general plan amendments and re-zoning of this community a mere two years after the carefully developed and approved *Elfin Forest and Harmony Grove San Dieguito Community Plan*
- 3) the incongruent nature of a gated community in the Elfin Forest and Harmony Grove community and the existing environment
- 4) a packaged waste water treatment facility situated nearby and down-wind of existing homes
- 5) the enormous increase in traffic in a rural community
- 6) already heavily congested general vehicle access to this area
- 7) the proposed construction process, including blasting, earth moving, and grading will be lengthy and intolerable to the existing residents
- 8) nighttime light pollution
- 9) increased noise and destruction of peaceful rural character

Thank you for your consideration.

A handwritten signature in cursive script, appearing to read "S Marshburn".

Shellie Marshburn  
2738 Harmony Heights Road  
Escondido, CA 92029



## Ehsan, Beth

---

**From:** Dan Matteoni <dan@sisinsure.com>  
**Sent:** Friday, July 19, 2013 3:24 PM  
**To:** Ehsan, Beth  
**Cc:** jessEQUEST@gmail.com  
**Subject:** RE: agenda for tonight's public EIR scoping meeting  
**Attachments:** SIS Insur13071914080.pdf

Hi Beth,

Attached you'll find my comments for the NOP. Below are links substantiating the information. I've also included a photo showing our horse arena just behind the trees on the corner of Eden Valley Lane and Romance Rd. The plans show homes being built where the sign in the foreground is. Just to reiterate, I will not be granting any easements onto my property for roads improvements. Please confirm receipt of this email prior to the 4 pm deadline on 7/19/13. Thanks for conducting the meeting a few weeks back.

Regards,

Dan Matteoni  
3043 Eden Valley Ln.  
Escondido, CA 92029

Links below to equine studies:

<http://www.annarbor.com/pets/horses-sensitive-hearing-makes-them-more-reactive-to-loud-sounds---like-fireworks/>

[http://wfae.proscenia.net/library/articles/radle\\_effect\\_noise\\_wildlife.pdf](http://wfae.proscenia.net/library/articles/radle_effect_noise_wildlife.pdf)





**From:** Ehsan, Beth [<mailto:Beth.Ehsan@sdcounty.ca.gov>]

**Sent:** Wednesday, July 10, 2013 12:44 PM

**Subject:** agenda for tonight's public EIR scoping meeting

Good Afternoon,

Just a quick reminder, tonight is the public scoping meeting for the Valiano project.

As previously announced, the meeting starts at 7:00 pm at the Elfin Forest Fire Station, at 20223 Elfin Forest Rd, Elfin Forest, CA 92029.

Attached is the agenda for your information.

Thanks,

Beth

**Beth Ehsan**

**Land Use/Environmental Planner**

**Planning & Development Services**



MARK WARDLAW  
Director

DARREN GRETLER  
Assistant Director

**County of San Diego**  
**PLANNING & DEVELOPMENT SERVICES**

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**VALIANO SPECIFIC PLAN; PDS2013-SP-13-001**  
**JULY 10, 2013, ELFIN FOREST FIRE STATION**  
**PUBLIC SCOPING MEETING COMMENT SHEET**

We live on the corner of Eden Valley Lane and Romance Rd. Construction would be within 20 feet of our horse arena. There's many studies on the negative effects loud noises have on equines. The scope of this project will produce incredible, sudden noise that could harm or kill our extremely expensive show horses. Also, Eden Valley lane is a very dangerous road with or without livestock. There is zero visibility just before our home. Increased traffic would be extremely dangerous. Lastly, I will not grant any easement on my property for road improvements.

Links to hearing/noises & horses  
Sent in email to email below.  
pictures too



Signature, Date

Daniel Matheoni

Print Name

3043 Eden Valley Lane

Address

Escondido, CA 92029

City, State, Zip Code

5510 Overland Avenue, STE 310  
San Diego, CA 92123

Phone#: (858) 694-3103

Fax #: (858) 694-2555

e-mail: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

NOP COMMENTS MUST BE RECEIVED BY 4:00 PM **July 19, 2013**



MARK WARDLAW  
Director

County of San Diego  
PLANNING & DEVELOPMENT SERVICES

DARREN GRETLER  
Assistant Director

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VALIANO SPECIFIC PLAN; PDS2013-SP-13-001  
JULY 10, 2013, ELFIN FOREST FIRE STATION  
PUBLIC SCOPING MEETING COMMENT SHEET

I am strongly object to this project being approved by the County because when the 740 Homes were approved several years ago, that was already too dense for our rural character of our neighborhood. To add another 300+ homes, this is too much. First, the traffic will be unbearable. Second, Country Club Drive can not support the built out 1000 homes. Residents & visitors, 5000 to 9000 sq. ft. lot size does not belong to this neighborhood.

 7/16/13  
Signature, Date

Kevin McClun

Print Name

1570 Country Club Dr.

Address

Escondido, CA 92029

City, State, Zip Code

5510 Overland Avenue, STE 310  
San Diego, CA 92123

Phone#: (858) 694-3103

Fax #: (858) 694-2555

e-mail: [beth.ghsan@sdcounty.ca.gov](mailto:beth.ghsan@sdcounty.ca.gov)

NOP COMMENTS MUST BE RECEIVED BY 4:00 PM July 19, 2013



MARK WARDLAW  
Director

**County of San Diego**  
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**VALIANO SPECIFIC PLAN; PDS2013-SP-13-001**  
**JULY 10, 2013, ELFIN FOREST FIRE STATION**  
**PUBLIC SCOPING MEETING COMMENT SHEET**

IN GENERAL I AM AGAINST THE SCOPE OF THIS PROJECT  
AND THE DEVASTATING EFFECT IT WILL HAVE ON  
THE CHARACTER, ATMOSPHERE, AND ENVIRONMENT  
OF BORN VALLEY. I HAVE ALREADY SUBMITTED  
SPECIFICS VIA LETTER TO THE COUNTY AND WILL  
FOLLOW UP WITH ANOTHER LETTER AFTER THIS  
MEETING.

Andrew McSparron 7/10/2013  
Signature, Date

ANDREW McSPARRON  
Print Name

1021 COUNTRY CLUB DR  
Address

ESCONDIDO, CA 92029  
City, State, Zip Code

5510 Overland Avenue, STE 310

San Diego, CA 92123

Phone#: (858) 694-3103

Fax #(858) 694-2555

e-mail: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

NOP COMMENTS MUST BE RECEIVED BY 4:00 PM **July 19, 2013**

McSparron

July 12, 2013

Re; Valiano PDS2013-SP-13-001

From; Andrew McSparron, 1021 Country Club Dr, Escondido, CA 92029

To; Beth Ehsan

Dear Ms. Ehsan

My wife and I have lived in Eden Valley 32 years. My wife's parents built the home we live in 44 years ago. Our daughter was one year old when we moved here and my son was born in the home we still live in. We felt as if we had moved to paradise; where our family could grow in a safe, healthy, quiet, country environment. We have seen tremendous changes over the years including a population which has increased at least three fold, but it still has that country atmosphere where we enjoy numerous wild animals, horse ranches, a dirt road, quiet evenings with crickets and frogs, and a night sky with stars overhead. I am deeply concerned with the proposed development which would add 360 homes to this small piece of heaven which my family and our neighbors are more than willing to fight to maintain.

I appreciate the obvious effort which the county has made, to this point, in preparing the "Initial Study", and I agree with most of the points made as having significant impact and would like to expand on a few of those points. Additionally, I disagree with several points as having no or minimal impact and will also address that.

1. I strongly disagree with section I Aesthetics, subsection d in the study dealing with light pollution. One of the finest features of this valley is the fact that we still have quite dark star lit nights. The developer may install low impact lighting and comply with all other applicable codes, but that won't stop future homeowners from installing whatever type of lighting they want for landscaping, security, interior lighting and for general exterior lighting around their property. With 362 homes proposed, that would create a tremendous amount of light pollution. Add to that the vehicles travelling around at night projecting driving lights all over the valley, and street lighting, and there will be significant impact on the area.
2. Section VI b and c seems to state that there would be no significant impact to the existing waterways. I believe this statement borders on the ridiculous and that there would be a major impact to the fragile drainage systems now in place. These drainage systems are, by in large, systems which the individual property owners have established on their own without any direction from the county and without a general plan to follow. Right, wrong or indifferent that's the way it is. To add elevation and

pave huge areas where rain water will just run into storm drains and be dumped into the valley without any possibility of soaking into the ground will have disastrous effects downstream. There is a seasonal stream which comes from the avocado groves on the eastern side of the Coronado Hills, crosses the bottom part of my, and neighboring properties and continues towards Country Club Drive parallel to our easement road. Under the current conditions it floods whenever we have any significant rain. This project will turn what is barely acceptable into a disaster waiting to happen.

3. The only north/south road into and out of the valley is Country Club Drive; a specified "traffic calmed" road, which is a two lane country road with no curbs, no sidewalks, and limited commercial truck traffic. There are trees all along the edge of the road and in some cases overhanging the street. It has been downgraded because of the increase in traffic which will be caused by the Harmony Village project currently in development. The road simply won't stand another development and the congestion it will create. The easement road I use to get onto Country Club Drive is dirt with an already restricted view of traffic from the north. I am concerned about being able to safely access Country Club Drive with the proposed increase in traffic.

4. I am concerned about the loss of habitat for the many types of wild animals, including red shouldered hawks, red tailed hawks, falcons, kites, great blue herons, egrets, barn owls, western great horned owls, deer, bobcats, and yes even coyotes.

5. I am concerned about the potential environmental losses caused by encroachment into sensitive wetlands areas, covered by oak trees. These areas have been designated by the Army Corps of Engineers as environmentally protected areas which we were assured could not be removed, altered, or built on or near.

6. I am concerned about the increase in ambient noise and the disastrous impact it would have on the rural nature of our community.

Thank you for your meeting on July 10<sup>th</sup> and the opportunity to respond to the initial study. I hope that my points will be considered as this proposed project continues through the approval steps.

Sincerely; Andrew McSparron

**Ehsan, Beth**

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Mohler

**From:** The BarnDog <barnj@cox.net>  
**Sent:** Thursday, July 18, 2013 9:00 AM  
**To:** Ehsan, Beth  
**Cc:** Shannon  
**Subject:** Re: PDS13-SP-13-001. LOG NO. ER-13-08-002; VALIANO

**Mark Wardlaw, Director**

**Planning and Development Services**

**County of San Diego**

**5510 Overland Dr.**

**San Diego , Ca. 92123**

**Dear Mr. Wardlaw,**

**As a resident of Eden Valley on Surrey Lane, I appreciate the opportunity to comment on the Notice Of Preparation for the Environmental Impact Report for the Valiano/Eden Hills Project.**

**(Valiano SP 13-001 )**

**As a 35 year resident of this valley I have kept records on many agricultural and climatological data. By observation this valley stays between 8°f and 10°f cooler than the city of Escondido just to its east... With a Large Development of 742 homes going in just a mile south of my place here on Surrey Lane, The huge Urban Heat Island created by destroying the natural ground cover and replacing it with much more square footage of asphalt roofs and streets and cement driveways and sidewalks will be significant. What is the affect of this and the prosed Valiano development of 200 ++ more acres of roofs , and asphalt cover added to it?**

**This Valley Is An Inversion Micro Climate.**

**This Proposed development ( SP 13-001 ) is shown above the valley floor on the West slope and would produce a heat layer of warmer air over the valley at night when we rely on radiation cooling.. Heat given off at night from the development will be forced to stay over the valley. Heat from the valley floor which would normally cool will be stopped from dissipating. And much cooler ocean marine layer , coming in at 1000 ft or so will producing a cap over the valley. This will raise over night Temperatures. Our over night lows are 55°f to 60°f most summer nights in this valley ... How much will the Valiano project increases our temperatures and how will it mitigate those increases?**



**Please keep in mind that developer can not mitigate a heat footprint this large with some landscaping and a few trees... They do nothing to replace the 20ft Chaparral and Tree Canopy that has protected all of this land from solar radiation for eons. That natural canopy keeps ground temperatures 50% cooler than bare earth in full sun. What indepth plan does Developer have?**

**Also “Cool Pavers or Pavements”: These would most likely be of the reflective type in this climate. While reflecting solar radiation from a road surface may cool that surface by a small percentage, That radiation doesn't disappear.. It is reflected on to the next thing it can hit. Be that a building or infrastructure junction boxes or metal playground equipment and heat them up beyond what would be their normal level with out the extra radiation hitting them. How does developer intend to fill the obvious gap between what we now have, a natural total ground shade of large native plants and grasses ? A Landscaping plan and a reflecting road surface will hardly come close i suspect.**

**Which brings up another point: How will developer mitigate the increase , ( can be 20% ) of artificial light reflected by such road ways? That which reflects solar radiation also reflects light from electric lights.. This valley is a Dark Skies community... Since the valley is only a mile across it does not seem as though this development will fit into such a long standing rural community.**

**Demand For Cooling. What is the Mega Watt demand to service this development? It is understood that the amount of Power is limited by at least 20% to the county with the loss of the San Onofre Power Plant. Although the Sunrise Power link is now available to us, that is just to barely fill in for the San Onofre Plant and doesn't count in any further increases in demand built in the future. Production of this amount of power has a pollution footprint.. How will developer address this? We can all come dangerously close to brown outs at anytime with the current grid.**

**In addition, What are the cumulative effects of both the 742 unit HGV development and SP 13-001 on Air Pollution produced by increased Auto emissions on a narrow and close valley? I understand we are looking at 2800 new auto trips from 362 homes. Developer wants to increase new development in the valley by 35% over the already approved HGV 742. This is just too large an increase for a neighborhood that has already sacrificed so much to absorb 742 new units in HGV.**

#### **Transportation/Traffic:**

**Cumulative impacts to traffic that include the development of this project will be significant. Downgrading of Country Club Drive, Harmony Grove Road, Elfin Forest Road in the Circulation, Element, the double-tracking of the Sprinter line at Mission Road and Nordahl Rd., and the long term delay of the extension of Citracado Parkway will impact the traffic patterns and all these circumstances need to be included in the traffic studies with mitigation and infrastructure steps be developed.**



**Traffic impacts should be studied on a cumulative basis, including anticipated traffic from the adjacent Harmony Grove Village project (742 homes). Old Country Club Dr. is a Traffic Calmed Road and we need it to stay that way. There are 100 yr old Olive trees along Country Club Dr. at Surrey Lane that were on the fairway of the Old Country Club of 100 yrs ago... They need to remain. How would developer protect these living icons of a century?**

**It has yet to be explained how a “ GATED” community will, or even Can be integrated into an entire valley neighborhood consisting of one acre Ranchetts and larger Country Estates that are over 50 years established and settled.. The Harmony Grove Village is some what segregated form these older established properties as it is being built on old dairy land to the far south end of the valley and was never before included in the Residential neighborhoods to the north. The joining , not integrating , of the HGV project has taken the better part of 10 yrs and thousands of hours of hard work by the residents of Harmony Grove/ Eden Valley to negotiate with the County Planning Staff and The HGV people. The results of all this effort was to lock down an HGV that will work with the established Ranchetts and Country Estates on the northern end of the valley. This all being set down in the County's General Plan with Promises to the current residents that nothing less than one acre properties will in the future be allowed to disrupt the Eden Vally area and the peace found there in. If Developer wants to increase the density of this valley then Developer must adhere to the over all lot sizes designated in the General Plan for this community.**

**Gratefully :**

**Barney J. Mohler**

**2721 Surrey Lane**

**Escondido, Ca. 92029**

**760-741-5457**

Osborn

Mark Wardlaw, Director  
County of San Diego  
Planning and Development Services  
5510 Overland Avenue, STE 310  
San Diego, CA 93123

Re: Response to Notice of Preparation (NOP) for EIR 13-08-002.  
362-Unit Residential Subdivision, West of Country Club Drive;  
APNs: 232-013-01, 232-013-02, 232-013-03, 232-020-55, 232-492-01, 232-500-18, 232-500-19,  
232-500-20, 232-500-21, 232-500-22, 232-500-23, & 235-031-41.

Mr. Wardlaw,

I greatly appreciate the work that Beth Ehsan has done. She has been very helpful in answering questions and in helping me to understand this process.

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Valiano project – PDS2013-SP013-001, LOG NO. ER-13-08-002; Valiano.

The Eden Valley Community is a rural residential community comprised of large lots with equestrian, large animal keeping, and agricultural uses. Eden Valley is part of a greater rural community comprised of Harmony Grove, Elfin Forest, and Coronado Hills.

The population of Harmony Grove is expected to increase dramatically as the Harmony Grove Village development pattern is built out. If the pattern shown on the General Plan Land Use Map is strictly followed, the final number of new urban homes should be approximately equal the number of existing rural homes in the neighboring communities – without the inclusion of the proposed Valiano project. This will allow the rural residents to maintain their rural voice.

In preparation of the Environmental Impact Report for the project identified above, please consider the below areas of concern in the environmental review document.

**Alternatives to the proposed project:**

The proposed project could be built to the current zoning set by the General Plan which would greatly lessen the environmental impacts on many fronts. The communities of Eden Valley, Harmony Grove, and Elfin Forrest have worked long and hard with the county staff to ensure the resulting general plan met our community character and rural lifestyle.

The General Plan was adopted only two years ago - the applicant had significant opportunities to work with the county in the same manner the community did during the initial development. In fact, the applicant received an increase in density on a portion of their property during that process. They were then later denied additional density last year when they applied for a variance of the GP during the General Plan cleanup efforts.

The applicant should make significant efforts to work with the community, not against them, to create a project that is acceptable by both parties.

The proposed project may blend better with the existing communities of Eden Valley and Harmony Grove if it were not a gated community.

NOTE: I have not seen anything in the NOP that mentions the number of lots the current zoning would allow for.

**NOP Response:**

The project description in the NOP is not accurate and can be misleading in regards to the surrounding community of Eden Valley, Coronado Hills, and Harmony Grove:

1. The description contains no mention that Neighborhoods 1 – 4 are in the Escondido Sphere of Influence and that neighborhood 5 is in the community of Harmony Grove, which was removed from the Escondido Sphere of Influence (See Elfin Forrest and Harmony Grove San Deiguito Community Plan page 15 section b “Relationship to Adjoining Communities”). Aside from this not appearing in the project description, the effect of the sphere split within a single project should be studied.
2. The NOP description states: “Typical surrounding lot sizes are 2 to 4 acres to the west and 1 acre to the east.”
  - a. Actually the typical lot size to the east of the project is 1 to 2 acres. Additionally there are several properties adjacent to the proposed projects that are 5, 10, and 20 acres in size.
3. The NOP description also states: “To the North/East are mobile home parks.”
  - a. To the north/east are more 1 to 2 acre residences off of Hill Valley – further North/East beyond that are two mobile home parks in the city of San Marcos. There is no connection from this development to the mobile home parks located in the city of San Marcos.
4. The NOP description continues with: “...to the North across La Moree are 5,000 square foot lots”
  - a. This makes it sound like the developed area abuts this area – the planned area of development does not. North of the planned developed area are avocado groves planted on steep hillsides which are noted by the county as being un-developable. In addition, the area including and across from La Moree is the city of San Marcos and there is no connection to San Marcos from this development or Eden Valley where the development is proposed. The described 5,000 square foot lots are a mile or more away.
5. The NOP description includes mention of the Village Boundary in stating “... the village boundary line is located about one-quarter miles south of neighborhoods 1 and 2...”
  - a. Based on the public tentative map, it appears that neighborhood 1 is on the village boundary line as is neighborhood 5. I also would like to note that the village boundary line was established by the county to ensure the “Village” and its higher non-rural density would not spread into the surrounding rural communities. The line was part of a compromise between the county and the surrounding communities. The community trust of the county should be studied/considered in regards to a development of this density.
6. The description fails to note that the entire project is surrounded by lots that are 1 acre or greater in size.

## **Section 1 – Aesthetics**

**Item 1A:** Neglects to mention the adverse impact on the loss of views from the local residences. The bulk of the project lies below many existing homes whose current views are of the agricultural lands and open spaces.

**Item 1D:** The Elfin Forest Harmony Grove Community plan and the recently submitted Eden Valley community plan (submitted to the SDPG March of 2013) both discuss the value of our dark skies. A project of this density will have a major impact on our dark skies despite measures to ensure light sources point downward. The project will be visible from the majority of Eden Valley and Harmony Grove as well as the surrounding cities of Escondido and San Marcos. In addition, in several areas of the project the neighborhood is planned to be significantly raised above the surrounding properties and thus downward pointing lighting will actually cause a significant impact on many of the existing Eden Valley residents. Given the visibility of the project, how will the light pollution be mitigated for the surrounding communities of Eden Valley, Coronado Hills, and Harmony Grove?

## **Section 2 – Agriculture and Forestry Resources**

Eden Valley is currently zoned for agriculture and there are several commercial businesses within the valley. The EIR needs to study the impact on these businesses ability to continue their operations with the proposed neighboring land use change and housing densities.

The EIR should specify the analytical model being used to evaluate the agricultural lands. If the LARA model is used, the conditions of the sites in Eden Valley need to be evaluated to ensure the model truly fits the agricultural lands it is intended to evaluate. If no other model is available, the model should be adjusted – and all adjustments noted in the EIR - to ensure the model fits the soil types, water situation, etc. for the agricultural lands it is being applied to.

According to the Rincon Del Diablo water district, there is a large, and potentially significant, aquifer beneath the valley and several wells currently exist within Eden Valley. Any evaluation of the agricultural value of the lands within the project area should include an evaluation of well water use for agricultural purposes, rather than imported water use.

## **Section 3 – Air Quality**

Section 3 seems to omit the existence of current residents whose homes adjoin the project site or are within a ¼ mile of the project site. All will be affected by the air quality issues especially since the project site lies in the basin of a valley. In addition, there are often weather conditions which create an inversion layer within the valley. Any air quality studies need to consider the topography, predominant westerly winds (the community of Eden Valley is primarily East of the proposed project), and all other weather conditions within Eden Valley when evaluating the air quality impacts.

As this project shares several property lines with the Harmony Grove Village project, there should be a cumulative study on the air quality impact these combined projects will have on the surrounding community and environment.

**Item 3A** –The description states, *“The project involves a General Plan Amendment that would result in approximately 125 additional residences an increase from 237 to 362.”* What is the 237 based on? I

believe current zoning is 1 to 2 acres. Per the general plan, I believe the proposed project is currently zoned for 1du per acre for 97 of the 209 acres in the project and the remainder is zoned for 1du per 2 acres. This would put the count to 153 total units not accounting for slope densities. That means it's an additional 209 homes – again not accounting for slope densities.

**Item 3B** – Second paragraph of the description speaks about the construction being phased and that certain phases would be in operation (I assume this means residents occupying homes). However, it fails to mention the immediately surrounding community of Eden Valley and its residents.

**Item 3D** – There is a day care facility on Country Club drive within ¼ mile of the proposed project.

**Item 3E** - The project is proposing a packaged sewer treatment facility. It will be the second of three to be built within a small radius (not including the Escondido HARF plant). The cumulative air quality impacts from these facilities should be studied.

#### **Section 4 – Biological Resources**

The proposed project's tentative map appears to isolate areas of biological importance and does not provide any wildlife corridors. This could have a major impact on the animal life and potentially create an increase road kill rate as animals move between the biological areas. This could also potentially increase human/wildlife contact. The EIR should address the creation of wildlife corridors.

Eden Valley is a haven for birdlife including many species of migratory birds. I have documented sightings of many bird species in my backyard including but not limited to: Anna's hummingbird, costa's hummingbird, bushtit, pine siskin, wilsons warbler, lesser goldfinch, wrenit, swallow, American robin, northern mockingbird, California quail, mourning dove, American kestrel, western scrub-jay, sharp-shinned hawk, purple finch, house sparrow, white-crowned sparrow, yellow-rumped warbler, house finch, dark-eyed junco, western wood-peewee, fox sparrow, ash-throated flycatcher, western kingbird, nuttals woodpecker, hooded oriole, western meadowlark, California towhee, European starling, greater roadrunner, barn own, peregrine falcon, great horned owl, screech owl, red-shouldered hawk, red-tailed hawk, golden eagle, bald eagle, turkey vulture, black phoebe, red-winged blackbird, black-necked stilt, snowy egret, mallard, killdeer, cormorant, great egret, Canada goose, great blue heron, road runner, and American white pelican.

I have also seen a diverse mammal, reptile and amphibian population including but not limited to: deer, bobcats, raccoons, skunks, rabbit, ground squirrels, weasels, opossum, mountain lion sign, coyotes, a variety of frogs, a variety of toads, a variety of lizards including a horned lizard, rattle snakes, king snakes, gopher snakes, rosy boa, and more.

The proposed projects impact on this diverse wildlife community should be studied in the EIR.

#### **Section 5 – Cultural Resources**

The Valiano Specific Plan Scoping and EIR Request Letter Attachment A item 12-1 (I assume all issues in this document will also be studied in the EIR) indicates that there are 9 archeological sites, two historic complexes, and one isolate located within the project site. Site CA-SDI-17506 was determined to be CEQA significant. Given the fact that there is currently an archeological dig occurring at the intersection

of Harmony Grove Road and Kuana Loa Road, which contains human remains, the sites within the project boundaries should be evaluated as being linked to the site currently being studied.

Valiano Specific Plan Scoping and EIR Request Letter Attachment A item 12-2 indicates that the NAHC will be consulted regarding the site findings. The current archeological dig should also be consulted as part of the EIR.

## **Section 6 – Geology and Soils**

**Item 6a3 and 6C**– There are areas within Eden Valley that have seen liquefaction ground failure. I have witnessed this in the area that is on the Northern border of neighborhood 3. This has occurred on two occasions – one caused an EDCO truck to sink to the base of its doors and sent out what appeared to be waves (like one might see in jello) across the surrounding area. The second occurrence happened while a D9 tractor was being used for road maintenance. These occurred in two separate areas along the border described above. Since this has occurred twice in the vicinity of neighborhood 3, the EIR should address this issue.

**Item 6e** – in the description it states that “No septic tanks or alternative wastewater disposal systems are proposed.” Isn’t a tertiary sewage treatment plant an alternative wastewater disposal system?

## **Section 7 - Greenhouse Gas Emissions**

As this project shares several property lines with the Harmony Grove Village project, there should be a cumulative study on the greenhouse gas emissions impact these combined projects will have on the surrounding community and environment at build-out.

## **Section 8 Hazards and Hazardous Materials**

**Item 8D** - The project is near the Palomar Medical Center which operates a heliport. This should be studied.

**Item 8E** - The project is in the vicinity of the Palomar Medical Center which operates a heliport (a private airstrip?). This should be studied.

## **Section 9 – Hydrology and Water Quality**

The Rincon Del Diablo Water District has been studying the size of the aquifer beneath Eden Valley. It is believed to be a significant source of water and could potentially be used for emergency water storage. The impact on the aquifers recharge should be studied given the sheer number of roofs and hardscapes within the project. In addition, the blasting that will be performed during the grading phase should be studied to ensure it will not harm the aquifer or the many wells in Eden Valley.

The impacts to this aquifer by the proposed project should be studied.

## **Section 10 – Land Use and Planning**

**Item 1A** – Eden Valley contains lots ranging from 1 to 20+ acres in size.

**Item 2A** – This project is in direct conflict with the Elfin Forest and Harmony Grove San Dieguito Community Plan. There is not a single item within the community plan that this project does not violate. Such an extensive variation from the community plan should be studied as well as its impact on alienating the communities of Harmony Grove, Eden Valley and Coronado Hills.

## **Section 12 – Noise**

**Item 12B** – This item is noted as having no impact, yet there will be significant blasting in the project area. While this would not be an ongoing impact, it will directly impact the surrounding communities for several years. The communities surrounding the proposed project have active large animal keeping including horses which are highly sensitive to ground vibration. In addition, there are several wells in the area which could be impacted by ground vibration caused by blasting and grading. The impacts of the ground vibrations caused by grading and blasting need to be studied.

**Item 12C** – Not only will Country Club Drive be impacted as a circulation element, but Hill Valley Drive and Mount Whitney Drive (the two access points for the proposed project) will also have the same impacts.

**Item 12E** - The impact caused by the Palomar Hospital Heliport should be studied.

**Item 12F** - The impact caused by the Palomar Hospital Heliport should be studied.

## **Section 13 – Population and Housing**

The people who live in Harmony Grove, Eden Valley, and the Coronado Hills have chosen to live in these communities because of their rural character and ability to have agricultural businesses and large animal keeping. The proposed development would significantly impact the ability of these communities to maintain the lifestyle that they have chosen and may displace them.

The balance of the community voice within the valley will be greatly changed. With the build out of the Harmony Grove Village project the community voice is nearly in balance between rural and suburban residents. The addition of this planned project will greatly impact the community voice throwing it out of balance. This impact should be studied and addressed in the EIR.

## **Section 15 – Transportation and Traffic**

Harmony Grove Village is currently in its grading phase and has already created some traffic issues for the neighboring communities. Any traffic study performed for the Valiano project should take into consideration the 100% build out of the Harmony Grove Village project which will be complete prior to the completion of the Valiano project (most likely even before the Valiano project breaks ground).

The planned double tracking of the Sprinter line at the intersection of Mission and Auto Parkway/Nordahl should be studied as part of the overall traffic study on the Valiano project. The trains currently run every 30 minutes and will increase to every 15 minutes. This will have a significant impact on the traffic in the area without the addition of the Harmony Grove Village and Valiano projects.

In recent news reports, the Citricado extension is grossly underfunded and may not be completed for at least another eight years, if ever. This will greatly affect the traffic patterns from the Harmony Grove

Village project as the Citricado extension was to provide a major circulation element to move traffic out of the HGV project – specifically north and south bound traffic. Now that this may not ever be built much of the North bound traffic will likely use Country Club Drive to access Highway 78. This should be taken into account in the Valiano traffic study.

Eden Valley and Harmony Grove are equestrian friendly communities and many residents ride their horses along Country Club Drive and other connecting roadways. Country Club Drive is posted for equestrian use. The traffic studies should include the impact on the continued use of all surrounding roadways by equestrians. Studies should include the potential need for additional trails to be added to limit any horse vehicle contact.

**Item 15D** - Additional hazards that should be studied include the numerous dirt roads and driveways that intersect Country Club Drive, Hill Valley Drive, Mount Whitney, and any other proposed existing roadways that may be used as ingress and egress points for the Valiano project.

**Additional Comments:**

The project lies outside the 5 minute response time for its designated San Marcos Fire department. According to item 13-5 in the Valiano Specific Plan Scoping and EIR Response Letter the San Marcos Fire departments response time would be 7.5 minutes and this does not account for the double tracking of the Sprinter line. The impact to the planned project of the long response time should be studied as a health and safety issue.

The Valiano project is located in a Wildland-Urban Interface Fire area. The project should be evaluated to ensure all Cal Fire regulations are met along with all San Marcos Fire regulations.

How the Valiano project will conform to the San Diego County Code Title 8 Zoning and Land Use Regulations, Division 6 Miscellaneous Land Use Regulations, Chapter 6 Resource Protection Ordinance Sec. 86.601 – 86.608 should be studied.

**In conclusion:**

I believe that, if Integral Communities worked closely with the residents of the surrounding communities, together, we could create a project that will provide them with adequate income and still fit our rural lifestyle. However, to date they have not made any serious efforts to work with our community and have only been in contact with a limited number of residents.

Sincerely,

Bill Osborn  
2952 Milpas Drive  
Escondido, CA 92029



Fm: PORTER FAMILY TRUST 03-04-96  
2964 Milpas Drive  
Escondido, CA 92029

July 10, 2013

To: County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110,  
San Diego, California 92123  
Attn Beth Ehsan, Project Manager

Thank you for the opportunity to comment on the Valiano Project SP-13-001 public scoping meeting regarding this development being held by the County tonight at 7:00pm at the Elfin Forest Fire Station located at 20223 Elfin Forest Rd, 92029.

The Porter Family has been residents in Eden Valley since 1986. We have participated in many community meetings concerning Eden Valley. We are addressing the Notice of Preparation of an Environmental Impact Report for the project listed as PDS2013-SP-13-001, LOG NO. ER-13-08-002; VALIANO. We are **firmly against the development of the project** and the following issues below are why!

The Project Description by the developer has one major discrepancy stating the project would include public multi-use trails, smaller private trails. These privileges have been granted years ago by the county and these trails are now dedicated, mapped and recorded. What other issues have they presented that are not accurate!

#### Land Use & Planning

1. The Porter family is against any change to the General Plan Semi-Rural Regional Category from Semi-Rural 1 (SR-1) and Semi-Rural and (SR-2) Land Use Designation. Eden Valley should remain A70 with minimum lots sizes of 1 and 2 acres. This developer (Integral Communities) was denied a zoning change last year (NC-17) and if they need to build in Eden Valley they should conform to the current zoning that the community has worked for the past 10 years to maintain.

#### Transportation and Traffic

2. The Valiano NOP & the County list this as a Potentially Significant Impact to the community. Milpas Drive is a dirt road off of Country Club Drive and even though at various periods during the day there is a delay on egressing onto Country Club Drive we request that Country Club Drive remain a two lane country road with the current designation of a "traffic calming area" with (7 tons) weight restrictions and lower speed limits from Hill Valley Drive to Mt. Whitney Road.

The Valiano NOP indicates that the traffic flow is 4,430 ADT with the total trips of 354 with the inbound/outbound traffic as listed on page 36. The Valiano Plot map shows ingress & egress would impact Country Club Drive immensely. We request assurance and enforcement so that if this project is approved (with existing zoning of 1-2 acres and lower housing density) construction traffic will not access the site via Country Club Drive in the Traffic Calming area.

The New Urban West development project (Harmony Grove Village) already in production with 742 units was approved by the County with Citracado Pkwy being listed as another way of traffic flow for Harmony Grove Village residents. The recent article in the UT San Diego dated June 24, 2013 states that the city of Escondido is \$16.4 million short of funds to complete Citracado Pkwy to the new Palomar Hospital and continue it to I-15 freeway. This will adversely contribute to additional traffic north on Country Club Drive. Since we have to live with the traffic from Harmony Grove Village in the near future with double the ADT and if Valiano is approved, Country Club Drive will become unbearable and vehicles will be backed up from the Auto Park Way signal & Country Club Drive to possibly Hill Valley Drive or further! This will be a serious issue and to allow exemptions will set a dangerous precedent!

## AESTHETICS

3. The Valiano NOP & the County list this as a Potentially Significant Impact to the community. This project is entirely in Eden Valley other than Neighborhood 5 which is just south of Mt. Whitney Road. When the Harmony Grove Village development was approved by the County it was stated that the area north of Harmony Grove Village would be listed as a **BUFFER ZONE** and no future projects would be allowed! The Valiano development will change Eden Valley's open space that exists now to an urban sprawl. This project is an unmitigated disaster without the preservation of the surrounding properties in Eden Valley!

## Hazards & Haz. Materials

4. The project lists having their own on site tertiary sewage treatment plant which requires the storage, handling, transport, emission and disposal of hazardous substances. We are concerned about having two treatment sites within two miles of each other and the Escondido treatment facility three miles away. The Harmony Grove Village & the Valiano project must transport waste away periodically from their sites. Which ingress & egress roads will they be designated to transverse on?

## Biological Resources

5. This project also has many California Coastal Oaks on it, and previous owners who wanted to cut them down were denied. This issue must be addressed. The Industrial Park north of Hill Valley Drive at one time had a good size pond that, during the winter, would drain south into Eden Valley and on to the Escondido Creek. The city of Escondido required the developer to install a holding area and install dampers to slow the drain off south from the industrial area into Eden Valley and eventually into Escondido Creek. In the rainy season there is a great amount of water draining south. This must be addressed if the planned project inhibits or blocks the flow of the water in Eden Valley Creek south and could cause issues with residents north to Hill Valley Drive.

## Air Quality

6. The air quality will decrease dramatically during the construction activities in Eden Valley and with the project completed the additional emissions from vehicles and homes will degrade Eden Valley air quality even more than what we enjoy now!

## Agriculture and Forestry Resources

7. The location of this project is host to a large number of wildlife (Red-shoulder hawk. Golden hawk, deer, squirrels, coyotes and rabbits) and you must address mitigation for all sensitive plants that could be in the project area.

The PORTER FAMILY TRUST 03-04-96 understands that Integral Communities, Project Valiano SP 13-001 has the right to develop land they own, but the Eden Valley community has taken more than our fair share of development in the past few years. We request that the County Planning Department will determine in their findings that the seventeen "Potentially Significant Impact" issues cannot be resolved and a NEGATIVE DECLARATION be given to this project.

Sincerely,



William A. Porter

Merlyn Porter

2964 Milpas Drive

Escondido, CA 92029

[billporter8964@att.net](mailto:billporter8964@att.net)



MARK WARDLAW  
Director

County of San Diego  
PLANNING & DEVELOPMENT SERVICES

DARREN GRETHER  
Assistant Director

5510 OVERLAND AVENUE, SUITE 110, SAN DIEGO, CALIFORNIA 92123  
INFORMATION (858) 694-2960  
TOLL FREE (800) 411-0017  
www.sdcounty.ca.gov/pds

VALIANO SPECIFIC PLAN; PDS2013-SP-13-001  
JULY 10, 2013, ELFIN FOREST FIRE STATION  
PUBLIC SCOPING MEETING COMMENT SHEET

We are already getting more wildlife on our  
2 1/2 acre property, bare except occasional trees,  
from the deforestation that has already happened.  
Where are all these animals & birds going to  
go when the developers remove all the trees  
& rearrange the landscape??

Our mailboxes have been observed  
being vandalized by those living on the street.

Rosemary Register 7-10-2013  
Signature, Date

Rosemary Register  
Print Name

1421 Country Club Dr.  
Address

Escondido, CA, 92029  
City, State, Zip Code

5510 Overland Avenue, STE 310  
San Diego, CA 92123

Phone#: (858) 694-3103

Fax #: (858) 694-2555

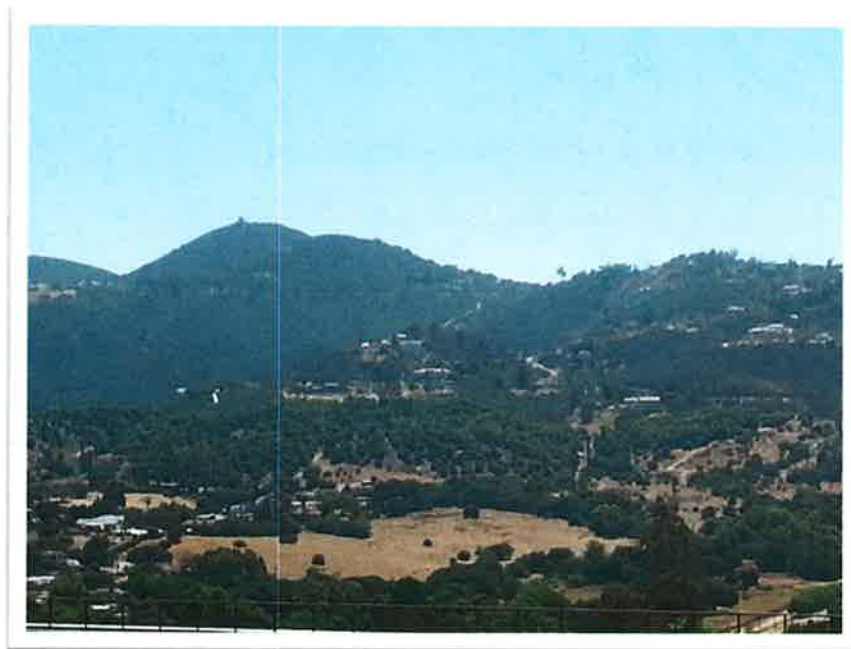
e-mail: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

NOP COMMENTS MUST BE RECEIVED BY 4:00 PM **July 19, 2013**

Response to Valiano PDS2013-SP-13-001, LOG NO. ER-13-08-002 CEQA – Initial Study

Many thanks to Beth Ehsan and her department for producing this thorough, well written document. She did a great job in describing our community and cataloging the adverse impact of permitting 362 house to be built, on lots a small as 4,500 square-feet, on 209 acres. Thanks also to the members of The San Diequito Planning Commission. Sadly, the developer, Integral Solutions, appears to be giving little respect to either as they have yet to present anything approaching applicable zoning and planning.

I- Aesthetics – I agree with the documented findings. Allowing such a radical deviation from the current zoning would be a slap in the face to all the people who worked so hard to create the existing general plan for our neighborhood. This would *not* be a minor variance. This would be shredding the existing plan and squashing of all who worked so diligently to produce it. Eden Valley truly has a scenic vista, by allowing clustered tract housing would forever ruin it.



(Eden Valley as seen from the new hospital)

II - Agriculture – I agree with the documented findings. Introducing clustered track housing to would lead to animosity. Home purchasers would soon complain about animal smells, flies and other realities associated with living in area correctly zoned for agricultural use. Suburbanites may also complain that roosters crow at dawn, even on weekends.

III - Air Quality – I agree with the documented findings.

IV - Biological Resources – I agree with the documented findings.

V - Cultural Resources – I agree with the documented findings.

VI - Geology and Soils – I do not completely agree with the documented findings. As shown in a photo on page 3, even in an affluent Encinitas neighborhood, developers can allow soils to erode into roadways

for years and years. Valiano would pave significant amounts of surface that could channel storm water directly to Mt. Whitney Rd which lacks adequate drainage as it is.

VII - Greenhouse Gas Emissions – I agree with the documented findings.

VIII - Hazards and Hazardous Material – I do not completely agree with the documented findings. Eden Valley has not has a wild fire in decades, so there is significant fuel. In the event of a fire there would only be one road out on the Mt Whitney side potentially trapping hundreds of people should it become impassable.

VIII - Hydrology and Water Quality – I do not completely agree with the documented findings. Introducing a sewage treatment plant would potentially have a significant impact. Also please see VI above.

X - Land Use and Planning I agree with the documented findings. These proposed changes to zoning make a mockery of the entire planning process.

XI - Mineral Resources – I agree with the documented findings.

XII - Noise – I agree with the documented findings.

XIII - Population and Housing – I agree with the documented findings.

XIV - Public Services – I agree with the documented findings.

XV - Recreation – I agree with the documented findings.

XVI - Traffic – I do not completely agree with the documented findings. My concerns include safety, traffic circulation as well as the developer leaving the roads in disrepair for years and never completing promised “improvements” (Please see photo on next page) There are currently 700 homes being constructed just to the south, Harmony Village. The primary ingress and egress was to be a newly constructed, multi-lane Citricado Pkwy. The City of Escodido recently announced that they were no longer willing to pay to complete the road. If that is never completed, 1000’s of car a day will be forced on to County Club Dr. The latter is a winding, 2-lane road shared by cars, trucks, bicycles, pedestrians of all ages, from the young to the elderly, with dogs and horses. To allow yet another 1,000 or so vehicles a day would truly be a calamity.

XVII - Utilities and Service Systems – I agree with the documented findings. (Please also see VIII Hazards above)

XVII - Mandatory Findings of Significance. – I agree with the documented findings.

In conclusion, I generally agree with the document. It clearly illustrates that it would not be responsible development to allow so many structures to be built on approximately 100 usable acres. I hope the developer will come back with a plan to build 80 or so homes. I ultimately hope that the San Diego County Board of Supervisors will come to a forward thinking, responsible decision.

Thank you.

Edwin Riley  
1480 Calico Ln.



(The corner of Ashbury and Hygeia in Encinitas more than 5 years after a developer promised to improve the road in exchange for a zoning change.)

**Ehsan, Beth**

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**From:** Juanita <jandjsav@prodigy.net>  
**Sent:** Friday, July 19, 2013 3:56 PM  
**To:** Ehsan, Beth  
**Subject:** The Valieano Project in Eden Valley

Dear Beth, I am concerned about the roads that the developer is planning on using to get to the area of construction. I live on a private access road that is a dirt road. It is never in good shape even when we just finish smoothing it out. I can't imagine what it would be if we give permission for trucks and large earth movers to use it. It is not wide enough for the fire department to let them use it even if they don't need our permission to use our access road. Because of the high level of ground water in the area, I understand they can't build on the property across the dirt road from us, but if they even have access to this flat property with earth movers our road will be negatively impacted in winter when it rains and all year round when we have ruts in the road. I appreciated having you put this on the list of concerns from the existing community. Thank you. Juanita Savage 1023 Country Club Drive Escondido

## Ehsan, Beth

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**From:** Pam Searles <pjsearles@gmail.com>  
**Sent:** Friday, July 19, 2013 12:48 PM  
**To:** Ehsan, Beth  
**Subject:** Valiano Specific Plan PDS2013-SP-13-001 Scoping meeting comment sheet

Concerns not in order of importance:

1. Inadequate fire and emergency response time. According to the Regional Fire Services Survey for the County of SD Office of Emergency Services 5/5/2010, response for Fire Dept is between 12-19 minutes 90% of the time. They may as well not even show up at that point, because the house will be an ash pile.
2. In adequate water supply, due to increased development density and decreased water supply due to yrs of drought. The 2010 Urban Water Management Plan highlights the stress on increased need and demand for water, and the compromised supply of water. It is unsustainable.
3. Degradation of the rural character from increased density includes increases in noise and air pollution and unsustainable traffic increases to surface streets. This area is zoned for 1 and 2 acre rural estates.

Pamela Searles  
1557 Calico Lane  
Escondido CA 92029



Semensov

July 19, 2013

Mark Wardlaw, Director  
Planning and Development Services  
County of San Diego  
5510 Overland Drive  
San Diego, CA 92123

RE: Valiano/Eden Hills Project

Dear Mr. Wardlaw,

I have been a resident of Eden Valley since 1960 and have seen many changes to our little valley over that time. Some of it has been beneficial; however, some has been devastating.

My main concerns over this project are vast and varied. I do not feel that the project as outlined fits at all into the character of the surrounding neighborhoods. A gated community in a rural residential community just doesn't make sense. I know that the developer feels this will enhance our valley, but simply by virtue of the fact that it will be gated, completely separates and alienates it from the beauty it wants to invade.

I have seen many animals and plants all but disappear from our area. California Valley Quail were once prolific; now, they are nowhere to be seen. We would have roadrunners and horned lizards all over our property. Now they too are gone. The beautiful manzanita bushes that used to cover our valley are sparse and with this and the Harmony Grove project which I know has destroyed several plants, will no longer be there for us to enjoy.

Then there's the matter of traffic and air quality. How can our little neighborhood support an additional 2.3 vehicles per household? I'm not a math whiz, but with the 742 homes in Harmony Grove Village plus the nearly 400 proposed homes in the Valiano project, that computes to over 2600 potential added vehicle traveling on our local roads.

Then there are the roads themselves. What is being proposed to assure they are going to be able to handle the added traffic so as not worsen an already unacceptable amount of traffic in our neighborhood? This area has always been an equestrian/livestock friendly community. These animals require certain consideration as well. The added traffic will not be conducive to their well being in any way, shape or form.

The residents of Eden Valley have worked and fought hard to maintain the character of our little community. We have had to make many concessions in the name of progress, but I'd like to know, when is enough, enough? Where is Rincon Del Diablo going to get the water to sustain these additional homes? Our water rates are already ridiculous and with the low rainfall we have, importing more water translates into higher costs for us all.

Another question I have concerns fire and law enforcement. Is the same Sheriff sub-station in San Marcos going to continue to be responsible for this area? The response time is already long. Then there's our traditional fire season. I hope more provisions are in the works to address the increased hazard and accessibility to these new homes.

I know that my neighbors have already commented on the various other concerns we all have, so I will close with this one last thought. My parents raised four children in the home my husband and I occupy. We, in turn, raised our three children in the same home. This has always been a safe, beautiful, country setting that we have been proud to call our home. My parents left California in 1974 because they thought things were getting too crowded. They are deeply saddened by what is being proposed as are we. WE would like to retain our rural community character. Revising the general plan we were promised would not change is not something we will support. Although we occupy one of the smaller parcels of land, ours was the first new home built on Calico Lane, and is our little slice of heaven here in California.

I hope you will weigh very carefully the impact this project will have on the more than 80 residents of Eden Valley and the adjacent areas. Thank you for taking the time to consider my letter and comments.

Respectfully,

Denise Semensow  
1420 Calico Lane  
Escondido, CA 92029  
(760) 743-7895

**From:** ansis <ansis@taftbroadcasting.com>  
**Sent:** Friday, July 19, 2013 12:58 PM  
**To:** Ehsan, Beth  
**Subject:** PDS13-SP-13-001. LOG NO. ER-13-08-002; VALIANO

Mark Wardlaw, Director

County of San Diego

Planning & Development Services

5510 Overland Avenue, Suite 110

San Diego, California 92123

**Re: PDS13-SP-13-001. LOG NO. ER-13-08-002; VALIANO**

Dear Mr. Wardlaw:

I have several concerns regarding the developer's request to a rezone his recently acquired property to allow him to build a high density gated community in a cluster environment.

#### Watershed

The valley contains a wetland area which is fed by rainwater percolating down from the hillsides which feeds this area year round. With this cluster of 362 houses on 209 acres, rain water which now soaks into the ground to replenish the ground water supply will instead run off the roofs, patios, drive ways and streets directly into our wetlands and streams. This runoff will also carry pollutants from the housing area in to our streams and eventually into the lagoon. Without the normal ground water replenishment, the wetlands will dry out during the summer dry season threatening the existence of the wildlife and the likely hood of severe flooding in the valley during winter rains will increase.

#### Air pollution

362 new homes translates into at least 720 new vehicles to the area, cars trucks motorcycles, etc. in this valley, and this figure could double depending on family size occupying those houses. These houses also produce significant greenhouse gases from water heaters, home heating systems, cooking and fireplaces. During the summer this valley enjoys consistent temperatures at least 5 degrees cooler than the surrounding areas but this creates an inversion layer trapping these pollutants, and the increased habitation will significantly aggravate this condition.

#### Traffic

The increased traffic from these homes and daily traffic from tradesmen and delivery trucks servicing this development plus the expectant traffic from the 742 home Harmony Grove Village project will create noise and pollution that needs to be addressed. Country Club Drive, is the shortest route to route 78 and shopping areas, the residents of both the Valiano project and Harmony Grove Village will traverse this road to travel to route 78.

Due to inconsistent and hap hazardous planning on recent housing developments in San Marcos and Escondido, route 78 is always congested, with traffic coming to a complete standstill at the Nordall exit, which the recent widening project hasn't alleviated. This project needs to take both local and regional traffic conditions into account when assessing traffic impact.

#### Conclusion

Eden Valley is rural in nature, extremely quiet, peaceful, and generally remains in its natural state. The area is single-family rural residential and agricultural in usage, with large lots, residential livestock keeping; equestrian trails, and access to the abundant wildlife that flourishes in this beautiful rural environment .To minimize the impact on this environment, building additional homes in Eden valley should only be on 1 or 2 acre lots as prescribed in the general plan.

Sincerely,

Ansis Straupe

3058 Hill Valley Drive

Escondido, CA 92029

Straupe

**Ehsan, Beth**

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**From:** olden stuff <oldenstuff@gmail.com>  
**Sent:** Friday, July 19, 2013 3:07 PM  
**To:** Ehsan, Beth  
**Subject:** Valiano Specific Plan ; PDS2013-SP-13-001

Mark Wardlaw, Director

Planning and Development Services

County of San Diego

5510 Overland Avenue

San Diego, CA 92123

RE: Valiano Specific Plan ; PDS2013-SP-13-001

Dear Mr. Wardlaw,

My husband and I purchased our home at 3058 Hill Valley Dr. in Escondido just two years ago in May of 2011. We are greatly concerned for the environment and the future of our beautiful Eden Valley community.

The pond here on our property here at 3058 Hill Valley Dr. was advertised to us as "designated as a Bird Sanctuary by the city of Escondido". Every day Great White Egrets, Snowy Egrets, Blue Herons and mallard ducks visit the pond. We have seen Mallard ducks pair off here the past 2 fall seasons and Mallard females have given birth and raised their ducklings to maturity and their final flight away from our pond for the past 3 summers. During the winter rainy season we have enjoyed the company of many Mallard ducks, Pintail ducks, American Widgeons and even several Merganser ducks. Our neighbors have told us of the stopover many winters of the Canadian Geese, but we have not yet had the pleasure of that experience.

We enjoy a multitude of wildlife here in our semi-rural country area, it is one of the main reasons we chose this property and we have great concern for their well being. Dozens of species of birds, several species of owls and hawks, raccoons, weasels, coyote, possum, rabbits, several species of snakes (including rattlesnakes) and even a few deer and bobcats all enjoy a peaceful existence in our semi-rural area. The rapidly increasing population and development of land in Harmony Grove and Eden Valley places a significant stress on the native wildlife populations by the loss of habitat and the conversion of land from its natural state to a developed landscape. Developing these areas changes the nature of the

vegetation which in turn will likely make it more difficult for some of our existing native species to survive. The wildlife has already been tremendously displaced by the Harmony Grove building project already underway. If the animals forced out of the area to extent that the Valiano developers propose, the majority will be forced out into surrounding areas where there will be less food and shelter to sustain them. The addition of more rattlesnakes and coyote will also present a danger to the children and pets of our neighborhoods.

Any area within the proposed Valiano project inhabited by species listed as endangered, threatened or of any special concern should be a priority for conservation.

Development and the encroachment of human activity will also have a detrimental effect on the existing wetlands. The more hard surfaces created by development the less rainwater would infiltrate the soil. Rainwater will run off the land at an increased volume and rate reducing the absorption of groundwater and increasing flooding to the lower areas of the valley, soil erosion, and sedimentation. Runoff from developed areas also is often warmer and polluted with pathogens such as bacteria and viruses, household chemicals, metals, fertilizers, pesticides, oil, and grease. When the vegetative buffers alongside water bodies are lost, sunlight can further cause water to warm beyond the threshold at which native species survive and reproduce. The creation of roads and development can also adversely affect the quality and flow of streams and wetlands by inadequate or inappropriately designed culverts.

There are several oak riparian areas and & wetlands in the area which are invaluable for many reptiles, amphibians and migratory birds and should be preserved. Maintaining ecological processes and sustaining the quality of air and water resources is essential to the health and quality of life for our community.

The south side of our property looks out across neighborhood 4 of the proposed Valiano project. We are 68 and 67 years old respectively and spent our entire married lives saving towards the day we could move to a country area such as this where we could live out the rest of our lives on a bit over an acre of our own property in peace, quiet and harmony with trees, birds and wildlife. We skipped vacations, didn't eat out much aside from fast food restaurants and shopped for clothing at discount stores. We sacrificed many things other people take for granted to achieve our goal. We chose Eden Valley for its unique country charm, lush hillsides, equestrian areas, vineyards and small farms and ranches. It has not been easy for people our age to pack up and move almost 100 miles, it was months before we finished some painting and could bring our furniture down. Yes, we had to do it ourselves in order to be able to afford to live here, and we have still not finished moving in. If we had had any interest at all in living close to a clustered crowded area of houses on as small as 4,500 square feet of property we would have never considered this area for our home, there are so many millions of homes in this country that fit that bill precisely.

Please preserve the rich heritage of Eden Valley by limiting the Valiano project to the existing General Plan limit of no more than 1 one residence per acre. We welcome new neighbors to enjoy the same pleasures we experience here, but we have no desire to ruin

Strape

**Ehsan, Beth**

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**From:** olden stuff <oldenstuff@gmail.com>  
**Sent:** Friday, July 19, 2013 3:18 PM  
**To:** Ehsan, Beth  
**Subject:** Valiano Specific Plan ; PDS2013-SP-13-001

Mark Wardlaw, Director

Planning and Development Services

County of San Diego

5510 Overland Avenue

San Diego, CA 92123

RE: Valiano Specific Plan ; PDS2013-SP-13-001

Dear Mr. Wardlaw,

Our home is one of 15 properties greater than one acre each located off of Hill Valley Drive that border the north boundary of the Valiano project.

One of the many concerns I have regarding the proposed Valiano project is the tremendous increase in traffic to not only Hill Valley Drive, Country Club Drive and Mt. Whitney Drive, but the atrocious amount of traffic we already experience daily on Auto Park Way and Highway 78. There has been negligible improvement in the congestion of those roads as a result of last years efforts at widening. One can easily imagine the havoc several thousand more trips per household would create if the Valiano project proceeds at the rate the developer has proposed.

On any given day there is a wait of 2-3 traffic light increments before one can proceed through any of the 1-4 traffic lights preceding the train tracks, reaching a destination of Highway 78 East or West bound, or one of the two shopping center entrances. Highway 78 resembles a parking lot every day. With more than 700 homes currently under construction at the Harmony Grove site, we may already well expect a very significant increase in traffic to the nearby shopping area without any other additional homes being built nearby. The failure of the completion of Citracado Pkwy. for several more years makes the traffic situation even more dire.

Driving down Country Club Drive yesterday afternoon I was struck by the beauty of Eden Valley. A private, gated residential development of 369 clustered homes on small lots is inconsistent with the atmosphere of our quiet semi-rural community. The unexpected visual impact of such a cluster of tightly packed homes rising up along the hillside above our large open lots, ranches, vineyards and equestrian centers is incompatible in the midst of the unique character of the Eden Valley community.

Currently at the end of Hill Valley Dr. and directly in front of the proposed entrance to Neighborhood Four of the Valiano project is a large home on a 20 acre lot with neatly plowed agricultural fields. Directly behind

this property the Valiano project developers plan to build a cluster of residences consisting of just 4,500 square foot lots . Nothing would look more atrocious than this beautiful large home surrounded by large palm trees, neatly plowed fields of crops and large open spaces with crowded residences packed tightly behind it.

Achieving a balance between economics and the health of our environment is vital to achieving a balance between private property rights and the goals of the community. The historic rural agricultural and equestrian character of Eden Valley should be preserved by limiting any new development to the current General Plan of just one home per acre per lot and maintaining the current animal keeping zoning.

Sincerely,

Madlyn Straupe

3058 Hill Valley Drive

Escondido, CA 92029



## Ehsan, Beth

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**From:** William Travis [mms16sst@aol.com]  
**Sent:** Wednesday, July 10, 2013 9:28 PM  
**To:** Ehsan, Beth  
**Subject:** Valliano Project

Beth,

After attending the 7/10/13 meeting in Elfin Forest, I would like to comment further on the project. I was particularly concerned about the flood plain issue in parcel 5. If they have to raise the level of the ground by approx.15 feet, 98 homes in that area will negatively impact that area's ambiance, and having street lighting that high will increase light pollution significantly.

Also, while no one commented on the sewage treatment plant right where the horse barn area is currently, we just got rid of the extremely offensive chicken ranch odors and certainly do not want another potential source of discomfort and negative visual impact, no matter how "odorless" they claim it will be. In addition, there will already be one sewage treatment plant for the new Harmony Grove Village just down the road.

William Travis  
2640 Harmony Hgts. Rd.  
Harmony Grove 92029

## Ehsan, Beth

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**From:** Craig Tucker <n6atq@hotmail.com>  
**Sent:** Tuesday, July 16, 2013 4:44 PM  
**To:** Ehsan, Beth  
**Subject:** PDS13-SP-13-001. LOG NO. ER-13-08-002; VALIANO

Mark Wardlaw, Director  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123  
Re: PDS13-SP-13-001. LOG NO. ER-13-08-002; VALIANO

Dear Mr. Wardlaw:

Thank you for the opportunity to comment of the Notice Of Preparation for the EIR of the Valiano project.

My name is Joseph Tucker and I have lived in the Eden Valley area of San Diego County for over 45 years. We have seen unbelievable changes to this general area and have for the most part accepted them as inevitable and a sign of the time. This is the first time I have written to oppose a building project because it is the first time I have felt so concerned that the entire atmosphere of the immediate area will be gravely impacted.

Having lived at 1307 Country Club Drive for these 45 years, I have dealt with the water flow in the creek that runs at the bottom of this valley. Some years it is very bad with water running on both sides of our house and if these 362 houses are built as proposed it will substantially increase the runoff into this creek with 362 roofs, driveways, sidewalks, yards being overwatered, etc., etc. This water runoff also affects nearly everybody that lives on Surrey Lane as well, causing septic systems to fail as the water table increases with every house that is built on the watershed for the creek.

The county very seldom cleans even the parts of the watershed it is legally required to clean ( the east/west ditches on the west side of Country Club Dr. that they created years ago ) I have for many years kept about 340 + feet of the creek cleaned out by removing weeds, cat-tails, small trees, etc. from the main north/south creek bed. Just yesterday I spent 2 hours with a rake and shovel working in this creek to remove the water-crest type plants, weeds, etc. from my 190 feet of the ditch and 150 + feet of the property to the south of me that is owned by the Bob Willis. {unbuildable because of water-table/perk-test } In addition to the north/south creek, I have also maintained/cleaned the 120 foot east/west county made

ditch in the very  
north edge of the property to the south of me as it impacts the main creek.

=====

Section VI Geology and Soils - they state that the soils found here have a soil erodibility rating of "moderate" or "severe", then moves on to state (pg 18) that the project will not result in unprotected erodible soils, will not alter existing drainage patterns, is not located in a flood plain, wetland, or significant drainage feature; and will not develop steep slopes.

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Which simply means 'They don't plan on doing anything to keep the 362 houses of "NEW" water runoff from making a bad situation much worse'

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Sincerely,  
Joseph Tucker  
1307 Country Club Drive  
Escondido, Ca. 92029

I request that Integral Communities not be allowed to move forward with the Valiano SP 13-001 project at its current density. They were denied a change in zoning last year (NC-17), and this current proposal has not changed since then. If Integral Communities wants to build a project within Eden Valley and Harmony Grove they must follow the current zoning that we have spent the past 10+ years working with the County to create.

Comments on N.O.P. Document RE: EIR for VALIANO ; PDS2013-SP-13-001, LOG #  
ER-13-08-002

Beth Ehsan

S.D. Co. Planning & Development Services

5510 Overland Ave., STE.110

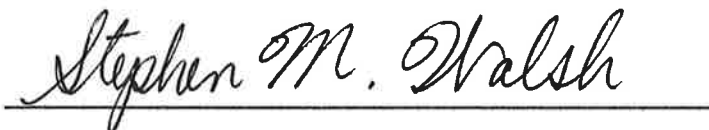
San Diego 92123

Dear Planning & Development:

I am Steve Walsh of 3052 Hill Valley Dr.

Recently circulated documents regarding the proposed Valiano Development show that the major entry/exit to the proposed 360+ home development will be on Hill Valley Drive. **This will not work.** Hill Valley DR. is only 26' wide & can only be widened by eliminating the sidewalk, often used by local residents like myself. 26' is only just barely wide enough for 2 cars to pass next to a parked vehicle if they do so with caution. It is impossible for 2 cars to pass if cars are parked on both sides of the street as recently happened at an event held in the newly established winery on Hill Valley Drive. Even if the sidewalk were eliminated it would still not be possible. Hill Valley Drive cannot be asked to handle the additional volume of traffic as proposed by Valiano.

Please also add my name to the long list of current residents of the Eden Valley area who object to the transformation of Country Club Dr. into a major traffic thoroughfare. We will all be negatively impacted by a development of the density proposed by Valiano.

A handwritten signature in cursive script that reads "Stephen M. Walsh". The signature is written in black ink and is positioned above a horizontal line.

Steve Walsh

7 / 14 / 2013



MARK WARDLAW  
Director

**County of San Diego**  
**PLANNING & DEVELOPMENT SERVICES**

DARREN GRETLER  
Assistant Director

5510 OVERLAND AVENUE, SUITE 110, SAN DIEGO, CALIFORNIA 92123  
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[www.sdcountry.ca.gov/pds](http://www.sdcountry.ca.gov/pds)

**VALIANO SPECIFIC PLAN; PDS2013-SP-13-001**  
**JULY 10, 2013, ELFIN FOREST FIRE STATION**  
**PUBLIC SCOPING MEETING COMMENT SHEET**

Country Club Drive (CCD) in its present 2 lane format is insufficient to handle the increased traffic between Mount Whitney Road and Auto Park Way emanating from the Harmony Grove Village project; additionally, the Valiano project will even further compound that problem. Widening CCD will require acquisition of land from those properties contiguous to CCD. All of those properties in the unincorporated (San Diego County) areas are currently on septic systems. Taking land from them for road expansion will reduce some of those parcels to less than ½ acre and will eliminate their septic system leach field reserve, an area equal to 100% of the initial leach field size.

None of the residents in the county area want to give up their septic systems nor do they want to be annexed into the City of Escondido. Unfortunately, if CCD is widened, the only mitigation available to these home owners would be for the Valiano developer to connect them to a sewer system.

Marshall Wright 7/18/13  
Signature, Date

MARSHALL WRIGHT  
Print Name

1224 COUNTRY CLUB DRIVE  
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5510 Overland Avenue, STE 310  
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Phone#: (858) 694-3103

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e-mail: [beth.ehsan@sdcounty.ca.gov](mailto:beth.ehsan@sdcounty.ca.gov)

NOP COMMENTS MUST BE RECEIVED BY 4:00 PM July 19, 2013