



January 30, 2017

**RE: VALIANO SPECIFIC PLAN PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2014-MUP-14-019, PDS2013-STP-13-003, PDS2013-ER-13-08-002 Environmental Impact Report.**

Dear Ms. Chan,

The mission of The Escondido Creek Conservancy (TECC) is to preserve and restore the Escondido Creek watershed. Our vision for the watershed is that vibrant urban communities and viable natural ecosystems thrive together. One of the ways that is accomplished is to place development in appropriate locations. Unfortunately, the Valiano proposal places an urban project in a semi-rural area which will erode the natural resource values of the area and undermine the quality of life for residents.

TECC concurs that more housing is needed. We support, in general, the current County General Plan especially those aspects that resulted from many years of careful discussions with the communities and are supported by thoughtful studies and community consensus. TECC opposes sprawl development, like this project, that produces negative impacts to our communities, environment, habitats, and transportation systems, while increasing the cost of services. We oppose projects that include unmitigated impacts.

**Biology**

Residents adjacent to the Valiano site regularly observe wildlife foraging on the property, including deer, bobcats, and coyotes. While much of site is impacted by fallowed agriculture, it still has habitat value, which, left alone or restored, would only improve. We need to recognize that keeping *common* species (such as deer and coyotes) *common* is one of the keys to protect complete ecosystems and protect threatened and endangered species so that they, too, one day can become common-again.

The effects of this project would negatively impact adjacent rural properties that are utilized by both common and threatened species. While there is mention of acquisition of mitigation lands for some of the impacts of this development, there appears to be no requirement to acquire said lands in the Harmony Grove/Elfin Forest/Eden Valley area. This is critical to the success of any potential mitigation to this project because the Escondido Creek watershed is currently a functioning habitat for such apex predators as the mountain lion.

As the area is coming under more pressure from adjacent development and human activities, of which this project is a prime example, it will become more difficult to maintain the viability of other preserved lands in the area. Over \$60 million, much of it public money, has been spent recently to develop a functioning wildlife preserve in the Escondido Creek watershed. This project will create additional issues of *edge effects* that will nibble away at the viability of all preserved lands in the area.

The Escondido Creek Conservancy

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[www.escondidocreek.org](http://www.escondidocreek.org)

- R-E-1 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the recirculated Draft EIR.
- R-E-2 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the recirculated Draft EIR.
- R-E-3 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the recirculated Draft EIR.
- R-E-4 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the recirculated Draft EIR.
- R-E-5 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the recirculated Draft EIR.
- R-E-6 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the recirculated Draft EIR.
- R-E-7 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the recirculated Draft EIR.
- R-E-8 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the recirculated Draft EIR.

COMMENTS

RESPONSES

R-E-9 [ Additionally, the open spaces proposed on the project site are too narrow, fragmented, and too close to the development. They would be so adversely degraded from edge effects that they would not function as viable wildlife habitat.

A few of these edge effects, are as follows:

R-E-10 [ 1. Introduction of invasive exotic vegetation inadvertently carried in from bikes, people, animals or spread from backyards or fuel modification zones. The plant pallet for the development should prohibit the planting of any species listed by Cal-IPC (now and in the future) as invasive. This prohibition should apply to the HOA-owned lands and the homeowners' private yards. How will this be addressed in the Final EIR?

R-E-11 [ 2. Higher frequency and severity of fire. Fires are a natural process but when too frequent can harm the environment. How will this issue be addressed in the Final EIR?

R-E-12 [ 3. Companion animals (pets) which can act as predators of and competitors with native wildlife, as well as vectors for disease. How will the impacts of domestic animals be addressed in the Final EIR?

R-E-13 [ 4. Use and creation of undesignated trails can significantly degrade the natural environment. How will the impacts of undesignated trails be addressed in the Final EIR?

R-E-14 [ 5. Influence on earth systems, such as solar radiation, soil richness and erosion, wind damage, hydrologic cycle, and light and water pollution, can affect the natural environment. How does the REIR address these cumulative impacts on the open space and nearby areas?

R-E-15 [ 7. Loss of foraging habitat. Natural predators utilize open areas and old agricultural fields for finding food. How does the REIR propose to mitigate these impacts?

R-E-16 [ TECC has facilitated the preservation of over 3,000 acres of some of the most bio-diverse and sensitive habitats in San Diego County. Less than one mile from the Valiano property is a 500-acre preserve contiguous with over 3,000 additional acres of protected habitat; this site also includes sensitive archeological sites. How will the final EIR address the edge effect impacts resulting from the new Valiano project on existing preserved open spaces?

**Fire Protection/Circulation Plan**

R-E-17 [ Wildland fire is a natural event in chaparral. However, the frequency and intensity of fires in San Diego County have increased well beyond the natural cycle due to human activity. This is a threat to the ecosystem and to the residents of Eden Valley and surrounding communities and cities.

R-E-18 [ The draft EIR only mentioned the Cocos fire of 2014 in passing and does not detail what occurred during that incident. Evacuation out of San Elijo Hills, Elfin Forest, Eden Valley, and Harmony Grove was not possible for many residents creating a significant safety issue (<http://www.utsandiego.com/news/2014/jun/07/san-elijo-traffic-review-cocos-fire-san-marcos/>).

R-E-19 [ Adding yet more housing in a valley with limited two lane roads that connect to level service F intersections in the city of Escondido will only make the situation worse. The Final EIR should address the fire evacuation situation considering the Cocos Fire experience. How will residents (existing and

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R-E-19 cont. new) safely flee another inevitable wildfire? Should shelter in place building standards be required not only for the structures in this development, but also for the existing residential structures in Eden Valley? This REIR does not address these issues in a serious manner.

R-E-20 **Changing Community Plan Boundaries**  
Lastly, the proposal to change community plan boundaries to skirt community standards, as posited in this REIR, is an ominous precedent that should be rejected.

R-E-20 A project could be built in Eden Valley to existing general plan densities, and existing community standards, if the developer listened to the community and addressed impacts in a responsible and forthcoming manner.

Sincerely,  
  
Richard Murphy  
President

R-E-20 The comment states that the proposed GPA would change the overall community plan boundaries in an effort to skirt community planning standards. As part of the GPA, Neighborhood 5 would remain within the SDCP boundaries, but be removed from the EFHG Subarea. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis. Also, alternatives have been evaluated in the EIR that address 2011 General Plan and Community Plan land use designations, and the Board of Supervisors will be evaluating those alternatives during Project decision making.