

COMMENTS

RESPONSES

San Dieguito Planning Group

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January 12, 2017

Ms. Chan,

The San Dieguito Planning Group is pleased to have the opportunity to comment on the Valiano recirculated DEIR.

While we did not discuss or evaluate the GHG section of the recirculation, our comments below focus on the land use section being recirculated. We have listed our comments following the DEIR outline.

1.1 Project Objectives

One of the project objectives is to “Provide increased residential density close to the shopping, employment, and transportation centers of Escondido and San Marcos.” According to the State-mandated 2015 Annual Progress Report, the San Diego County General Plan (GP) provides adequate housing capacity to meet the Regional Housing Needs Assessment (RHNA), which is adopted by SANDAG. Given the results of the 2015 Progress Report that housing needs are being met by the current GP and Community Plan (CP), and the fact that the project is sited in an historic rural community, we ask that appropriate data be presented that would support a project objective to increase density.

1.2.1 Project Description is Inadequate and Contains Inaccuracies

The project description inaccurately states “approximately 1.7 miles west of Interstate I-15 and 0.6 mile south of State Route 78 (SR-78) at its closest points”. This inaccuracy may lead the

R-F-1 Introductory comment noted. Please see responses to specific comments, below.

R-F-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-F-3 The comment suggests a change in how the EIR measures distances between the proposed Project and major freeways. Please note that these distances have been revised in the Final EIR in response to comments received on the Draft EIR circulated from April 30, 2015 to June 15, 2015.

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R-F-3 cont. reader to believe project is closer to road infrastructure than it is, a material fact in evaluating its overall location. Relevant data for the reader and decision maker are driving distances, which are conservatively measured at 2.7 miles and 1.4 miles, respectively.

R-F-4 Project description also states the two project areas (Neighborhood 5 and rest of project) “connect corner to corner”. In fact an existing private road, Mt Whitney, separates the two areas, and there is no direct access from one portion of the project to the next. There are two separate entrances and one has to exit the Eden Valley portion of the project to then enter the Harmony Grove (HG) section. This fact should be disclosed under Project Description because it underscores the fact the Project straddles two communities, which is material to the evaluation of whether community boundaries should be changed. Even if boundaries were modified, the topography would not allow for the project to connect internally to Neighborhood 5 (N5).

R-F-5 **General Plan Amendment PDS2013-GPA-13-001 wherein Neighborhood 5 would be removed from the Elfin Forest-Harmony Grove subarea of the San Dieguito CPA so that the entire Project site would be located within the San Dieguito Community Plan with no subarea.**

The Amendment is not needed “to provide consistency with GP policy LU-6.3 Conservation-Oriented Project Design which promotes clustered projects utilizing specific plans” as stated, because the Elfin Forest (EF) HG CP already provides for use of the Conservation subdivision to allow for clustering.

R-F-6 The removal of N5, wholly located within the boundaries of the community of HG, from its CP sets a precedent that challenges the very purpose of a CP. The CP documents the vision and standards for the future development of a particular geographic area and is a tool used by community and planning groups, as well as by County planners and prospective residents.
R-F-7 Removing inconsistent projects that nonetheless remain in the same geographic area weakens the objectives of every community planning document throughout the County. This could be seen as an opportunity for a developer to “opt out” of local planning standards and encourage “forum shopping”. We believe the broad-reaching growth-inducing impacts of this proposed action
R-F-8 require a County-wide study and extensive public hearings, far longer than the 52 calendar days currently allowed for this review.

R-F-4 Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis. The comment indicates that the EIR incorrectly describes how the Project area is situated. Chapter 1.0, Project Description, accurately describes the relationship of Neighborhood 5 to the rest of the proposed Valiano development. The commenter is correct in noting that Mt. Whitney Drive is located along the north boundary of Neighborhood 5, and the southern boundary of Neighborhoods 1 and 2. The road does not provide a barrier between the two uses, however. Similar to other roads in Eden Valley (e.g., Hill Valley Drive, Eden Valley Lane, etc.) residences on both sides of these roads are in fact connected by the road, and the level of access it provides to their abutting neighbors. In addition, as shown on Figure 1-18 of the Project Description, for Valiano residents moving between neighborhoods on foot, bicycle or horse, there are multi-use trails that connect directly between Neighborhoods 1 and 5, accessed from both the western and northern side of Neighborhood 5. As alluded to in the comment, residents accessing the rest of the development by car could exit Neighborhood 5 onto Country Club Drive and then turn onto Mt. Whitney Drive to enter Neighborhood 1 (portions of Mt. Whitney Drive are actually located within these two neighborhoods).

R-F-5 Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis. The comment is related to the need for the proposed GPA. It is possible that Neighborhood 5 also would qualify as a conservation subdivision (retaining 40 percent in open space), but it is immaterial because the neighborhood is part of the larger Specific Plan. As such, the most coherent analysis addresses the Project as a whole, rather than parsing different neighborhoods into different analytical categories.

R-F-6 The comment is related to the EFHG Subarea boundary line adjustment. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis.

The comment refers to the removal of Neighborhood 5 from the EFHG Subarea. As noted in the comment, a community plan sets a vision, and is used during evaluation of a proposed project. As discussed in the Draft EIR, the EFHG portion of the SDCP covers the planning areas of Elfin Forest and Harmony Grove, which total approximately 6,793 acres in size located within the larger SDCP area. Adjustment of the boundary line to exclude Neighborhood 5 from the EFHG Subarea, would affect only 48 acres of land.

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- R-F-6 cont. Land Use goals for the Harmony Grove community include preservation of the rural small town feeling, open access community design that unifies multiple developments into “one neighborhood,” and continued preservation and dedication of natural and cultural resources and open space. The Land Use Element encourages environmentally sensitive, responsible equestrian uses; preservation of a rural visual environment and visually significant resources; continued agricultural uses; and buffers between urban areas and rural residential uses. Please see Response to Comment R-D-3 for a discussion of the Project’s consistency with these policies. Goals of the Circulation and Mobility Element include providing safe roads for vehicle, pedestrian, bicycle and equestrian use, and adequately identified emergency response service providers. The Conservation Open Space Element outlines goals and policies for resource conservation and management, parks and recreation, and community open space planning. Other elements include the Safety Element, which discusses hazards/risk avoidance and mitigation, emergency preparedness and response and law enforcement; and the Noise Element. All of these elements were addressed in the Draft EIR, and the Project would be consistent with these goals. Removal of Neighborhood 5 is an administrative action that would not affect elements of the Project design that allowed for compliance with these goals. Please see Response R-E-20 for a discussion on the alleged impacts to the “community’s character” under the General Plan Amendment.
- R-F-7 The comment is related to the proposed EFHG Subarea boundary line adjustment. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis.
- R-F-8 The comment is related to the length of the public review period and the potential for growth inducement. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis. Revision to the EFHG Subarea does not have broad-reaching growth-inducing effects. Neighborhood 5 is the only area proposed for removal. This covers approximately 48 acres, or less than one percent (0.007) of the 6,793 acres of the SDCP. Growth inducement was addressed in the DEIR (Section 1.8). Future projects will undergo growth inducement review regardless of the plan within which they are located. According to CEQA, a 45-day public review period was required for the recirculation of the DEIR. Due to the holidays, an additional week of review was provided. No additional extension of public review is required.

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R-F-9 Indeed, this very possibility is addressed in the County-approved CP on page 21: “Annexation of Harmony Grove properties into adjacent cities allows landowners to escape the rural community development standards and must be discouraged.”

R-F-10 Further, in the “Land Use Planning Issues” section, it states “The Harmony Grove community, working with County staff, designed a Village Development Pattern Model as represented in the General Plan Land Use Map. There still exist many large undeveloped parcels of land within Harmony Grove outside the footprint of the approved Village. Development of these parcels with an urban, clustered or suburban design would threaten the continued existence of the rural residential and equestrian character of Harmony Grove. Annexation of parcels within Harmony Grove by adjacent cities would fragment the historic 100-year-old Harmony Grove community, disrupt the fragile ecosystem, and create unserviceable county islands.”

R-F-11 These CP excerpts or a reasonable summary of these concepts, along with other pertinent CP issues, goals, and policies that demonstrate the current project’s inconsistencies should be included in the DEIR under the “Elfin Forest and Harmony Grove Subarea of the San Dieguito Plan” section on page 3.1.4-4, and/or in section 1.6, page 1-25, “Project Inconsistencies with Applicable Regional and General Plans” so that the reader can fully understand the intent of these policies and consider the precise impact of removal of N5 from these local development standards.

R-F-12 In addition, alternative, and less impactful, methods of removing “the planning inconsistency of having N5 governed by the Elfin Forest-Harmony Grove subarea plan, with the rest of the Proposed Project being governed by only the San Dieguito Planning Area.” should be considered. Since they have different entrances and are not physically connected, the Valiano project could be developed as two adjacent projects with separate identities, an idea consistent with requests to name portions located in each community separately that were submitted by residents during the initial DEIR period. The relative merits of this method of reconciliation, which provides the opportunity for full compliance with the CP, should be explored. Another alternative for N5 is to comply with the HG CP and build according to its policies. That alternative should also be analyzed in the EIR.

R-F-14 There are several policies in the HG CP to which the Proposed Project does not conform:

R-F-9 The comment concerns Project consistency with the Community Plan. Although the Project proposed modification to the subarea boundary line within the Community Plan, the Project does not propose annexation into an adjacent jurisdiction. Please also see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis.

R-F-10 The comment refers to a statement in the EFHGCP. The EFHGCP subarea addresses a much larger area than the Project location. There are not large undeveloped parcels north of Harmony Grove Village within County jurisdiction. Please also see Response R-F-9 and Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis.

R-F-11 The comment requests a consistency analysis of the proposed Project with the EFHGCP, which was provided on pages 3.1.4-32 through page 3.1.4-36 of the DEIR. The discussion included analysis of the EFHGCP goals and policies for Land Use (Community Character, Community Growth and Community Conservation and Protection); Circulation and Mobility (Local Road Network, Pedestrian, Trip Reductions, Infrastructure and Utilities); Conservation and Open Space Element (Resource Conservation and Management, Parks and Recreation, Community Open Space Plan); Safety Element (Hazards/Risk Avoidance and Mitigation, Emergency Preparedness and Response, and Other Topics Law Enforcement) and Noise Element. As discussed in the DEIR, all land use policy impacts associated with the subarea plan were identified as less than significant. This text is now deleted as shown in the Recirculated DEIR because the proposed boundary line adjustment removes Neighborhood 5 from the EFHGCP and these policies are no longer applicable.

R-F-12 The commenter suggests including an alternative that would propose development of Neighborhood 5 as a second, separate project within the EFHGCP. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis.

R-F-13 The comment indicates that development of Neighborhood 5 should comply with the EFHGCP policies. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis for a discussion of the Project’s consistency with these policies. In addition, the EIR did include the General Plan Density Alternative in Section 4 which assumed that Neighborhood 5 would be developed in accordance with the HGVC.

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R-F-14a cont. *Policy LU-1.5.1 Require minimum lot sizes of two acres for lands designated as Semi-Rural 4 or lower densities and one acre for lands designated as Semi-Rural 1 and Semi-Rural 2 as the standards, unless significant preservation of resources is achieved and specific findings are met for the preservation of community character with the utilization of lot area averaging, planned residential developments, or specific plans.*

R-F-14b *Policy LU-1.5.3 Provide for lot sizes that will permit residents to keep leisure and market animals on their property.*

R-F-14c *Policy LU-1.5.4 Restrict land use primarily to single-family residences outside of the Village.*

R-F-14d *Policy LU-2.2.1 Ensure that the number of urban residences does not greatly exceed that of the rural residences in the greater unincorporated communities of Harmony Grove and Eden Valley.*

R-F-14e *Policy CM-10.2.1 Require all proposed new development to use septic systems with one septic system per dwelling unit.*

R-F-14f The EIR needs to address how the project will conform to these governing policies, even if boundaries were changed.

R-F-15 **Rezone (PDS2013-REZ-13-001)**

R-F-15 *“A portion of the property is proposed to change the Animal Designator “L” to “S.” The impact of changing the Animal Designator in the valley from one which allows horsekeeping by right under Animal Designator “L”, to “S”, where horsekeeping is prohibited, needs to be disclosed and evaluated as to the impact on community character. Specifically the EIR fails to clearly disclose which lots are under which Animal Designator, or even how many lots are under each.*

R-F-16 Without this information the public cannot fairly evaluate the extent to which the goal of building an equestrian-friendly community as advertised by Applicant has been met.

R-F-17 **1.2.1.1 Land Uses**

R-F-14a The comment states the Project does not conform with Policy LU-1.5.1. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis for a discussion of the Project’s consistency with this policy.

R-F-14b The comment states the Project does not conform with Policy LU-1.5.3. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis for a discussion of the Project’s consistency with this policy.

R-F-14c The comment states the Project does not conform with Policy LU-1.5.4. All of the Neighborhood 5 residences are single-family homes. The presence of “second dwelling units,” or granny flats, does not affect this designation. These spaces are intended as offices or to accommodate multi-generational families, as discussed in the Draft EIR. It is also noted that this is a requirement of State law (AB 2299, passed in 2016) that cannot be modified by the County. Even if the commenter disagrees that all Neighborhood 5 residences are single-family residential uses, as cited, the wording of Policy LU- 1.5.4 is to restrict land uses primarily to single-family residences outside the village. Neighborhood 5 has 55 residences, 20 of which are slated to have second dwelling units. As 35 of the units (or 64 percent) of Neighborhood 5 would be specifically one dwelling only, the neighborhood by default would consist primarily of single-family units.

R-F-14d The comment states the Project does not conform with Policy LU-2.2.1. The proposed SR-0.5 land use designation is a semi-rural category use, and does not result in introduction of urban residences into Neighborhood 5.

R-F-14e The policy cited in the comment, CM-10.2.1, is subordinate to the issue and goal above it. In the issue statement of CM-10.2 (under Section 2.10 Infrastructure and Utilities), it is clearly Elfin Forest being called out, while Harmony Grove as a specific stand-alone area is not cited as being subject to the septic guideline. In fact, based on the stated policy LU-1.1.3 that “Any and all development in Elfin Forest must be served only by septic systems...” and the lack of an analogous statement in the Harmony Grove policies, this restriction appears to apply only to Elfin Forest. In the goal that applies to both communities, it appears that any disposal system that retains the overall character would work, with no specification of type. The Project WTRF would be recessed and landscaped, with structures designed to look barn-like. As such, it would appear consistent with the rural character goal of the Plan. This

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- R-F-14e cont. is also consistent with General Plan Guiding Principle 9 that encourages the proper timing of new infrastructure with development for orderly planning and to minimize the cost to the public. Even if on-site treatment was not an evaluated option, alternative servers exist. These are addressed in Chapter 4.0, Alternatives, of the EIR; as are septic options.
- R-F-14f The comment states that the EIR needs to provide information on how the Project will conform to each of the policies mentioned in the above discussions. Specific focused discussion was provided as indicated in Responses R-F-14a through R-F-14e, above. In addition, these responses are part of the Final EIR, and therefore addressed again through their incorporation.
- R-F-15 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-F-16 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-F-17 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.

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R-F-17 cont. The description under “Residential” misstates the total amount of dwelling units by omitting the Secondary Dwelling Units (SDUs), which bring the total du’s to 388. In order for the public and decision makers to accurately understand the impact of the project it is important that the full project scope as measured by amount of dwelling units proposed be disclosed in this summary, likely the only one many will read. It would also be helpful in this paragraph to state that only 118 are allowed under the General Plan, instead of having to dig through the rest of the report to encounter the very important baseline for measuring the project impacts.

R-F-18

R-F-19 Under the Neighborhood 2 description where the concept of SDUs is introduced, the description needs to fully disclose the potential impact instead of using descriptors like “small” and “ideal for multi-generational families”. The description should state whether there will be any restrictions preventing these SDUs from becoming rental units. The reader can then more fully understand potential scope of impact with factual data as to their potential end-uses, as opposed to whether or not they would be best suited to one use or another in the Applicant’s opinion.

R-F-20 Regardless of whether there are restrictions on renting, the DEIR needs to fully disclose and analyze impacts on parking and traffic assuming a two-car household, as is typical for one-bedroom apartments in the 600 to 700 square foot range. Data needs to be presented in the EIR as to the basis of household size for dwelling units of that square footage in the region, including evaluation of parking needs: will street parking be allowed assuming 2 cars? If so, what will be impact on emergency evacuation and any other traffic considerations?

R-F-21 Under the Neighborhood 3 description, which “*would also accommodate animal enclosures on 21 lots*”, EIR needs to disclose whether they would be horsekeeping lots because that would perhaps be an erroneous conclusion if they are subject to Animal Designator “S”.

R-F-22 Under “*Parks, Recreation, and Open Space*”, the responsible party for maintenance is not disclosed for all the amenities proposed. Some indicate “*maintained by the HOA*”, which is clear enough, but most either do not state maintenance entity or state “*privately maintained*”. In order for the public to fully understand potential impacts, the maintenance entity and funding source should be clearly identified. For example, if a Community Benefit District or other entity beyond the boundary of the Project is to be assessed to maintain trails or any other portion of the elements described under this heading, this information needs to be disclosed in this section.

R-F-23 Under “*Wastewater Treatment and Water Reclamation Facility*”, we note that such a facility is in direct conflict with the EFHG CP, which specifically prohibits any wastewater method other than septic in HG. This impact should be disclosed and analyzed as it is material to the

R-F-18 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.

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R-F-20 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-F-21 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-F-22 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-F-23 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.

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R-F-23 cont. evaluation of whether to redraw community boundaries to evade the EFHG CP jurisdiction. The DEIR should also disclose whether the assumptions quoted of 71,800 gallons per day (gpd), which are based on the wastewater loading rates developed for the Harmony Grove Project back in 2006-07, are still current and accurate based on reduced residential water use since then. This disclosure matters because using a higher assumption could result in excess treatment capacity that could then be growth-inducing.

1.2.1.2 Access and Circulation

R-F-24 Emergency access is “proposed via Hill Valley Drive and Mt. Whitney Road”, yet these two roads lead evacuating traffic to exactly the same two-lane road operating at LOS F, Country Club Drive, as do the other Project access roads. This fact should be disclosed to the reader in this summary, and fully analyzed in Traffic and Hazards sections. A true emergency access via La Moree should be evaluated and impacts disclosed in FEIR.

R-F-25 Description of the various private roads should state whether the road widening proposed by Project is feasible based on available private easements and existing appurtenances within the proposed widened road beds such as fences, gates and the like.

R-F-26 Because “the Project proposes to construct northbound left-turn pockets at each of the four access locations”, the EIR needs to evaluate whether the current width of Country Club Drive and right-of-way status will in fact enable these pockets to be created, given the inability to widen the road in most instances.

R-F-27 Under “Trail Network”, the EIR needs to disclose who is responsible for the maintenance and whether existing residents outside the Project footprint could be assessed for maintenance.

1.2.1.4 Landscape/Hardscape

R-F-28 Fuel Modification: we note that the Fuel Modification Zone (FMZ) depicted on Figure 1-27 still extends beyond the Project property limit, placing an undue burden on adjacent land owners to be subject to “enforcement by the Fire Marshall” and other restrictions on vegetation choice on their private property solely to accommodate the Project. The EIR needs to fully disclose and analyze whether this impact could be precedent-setting in the Unincorporated County and the basis of legality of imposing such a burden on private property owners unconnected to the Project Applicant.

1.2.1.5 Grading

R-F-29

R-F-24 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-F-25 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-F-26 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-F-27 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.

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R-F-29 cont. Suggested maximum slope heights of 76 feet seem excessive for a rural setting. This should be evaluated under Visual Impacts section, which state there are none. If the suggested development model featured in the CP is followed for N5 for example, large lots would support homes built into natural hillsides and much less grading and fewer and lower retaining walls would be necessary. Please discuss merits of both models and their relative contribution to project objective *“Develop a community which complements and responds to the unique topography and character of the Proposed Project site and surrounding area.”*

1.3 Project Location

R-F-30 The recirculation of the project description deletes “The Eden Valley Portion” from the description, which is misleading because close to 200 acres of the project are located within Eden Valley; further, 48 acres, not 44 as stated, are *“within the Elfin Forest-Harmony Grove subarea portion of the San Dieguito CPA”*. It is unclear that describing La Moree Road as site access is accurate because there is currently no vehicular project access from that road.

1.4.1 Project Vicinity

R-F-31 It is inaccurate and misleading to state that *“the above-described areas in the Proposed Project site vicinity are bordered by more intensive urban development in the city of San Marcos and Escondido”*. In fact the closest lots in San Marcos, and the only ones visible from the Project, are the largest lots in the City of San Marcos and are zoned Agricultural. The Project Vicinity should also mention it is bordered by estate residential both on the North in San Marcos and East in Eden Valley and HG, way before getting to the boundaries of the city of Escondido. It is essential that the vicinity be described accurately for those readers not familiar with the area. The fact the higher density residential areas of Escondido and San Marcos are not visible from the project area, and that the project itself is bordered by estate residential on at least two sides, is essential to an accurate description of the vicinity.

1.5.2 Related Environmental Review and Consultation Requirements

R-F-32 For full impact disclosure add : “and for Fuel Modification Zones” after *“It would be necessary to consult with adjacent property owners wherever rights-of-way must be acquired and where easements would be needed for construction or maintenance”*.

R-F-29 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-F-30 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-F-31 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.

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1.8 Growth-inducing Impacts

Please add “and Harmony Grove” at the asterisk (*) in the following sentence: “*This EIR therefore evaluates the Proposed Project’s influence on growth in the Eden Valley (*) area as a result of an increase in residential density through general plan/specific plan amendments and rezone applications, on-site and off-site road improvements, and extension of public services or utility lines, and construction of a WTWRF.*”

1.8.1 Growth Inducement Due to Land Use Policy Changes and Construction of Housing

The DEIR fails to analyze the growth-inducing impact of the possibility for the first-ever removal of a portion of an existing community from that community’s approved CP for the expressed intent of avoiding development standards. There is another large residential development currently proposed for another area of HG, and the impact of this CP removal to set a precedent that could be utilized in other areas of HG is not mentioned or discussed. In fact the following statement “*First of all, as shown in Figure 1-2, substantial growth surrounding the Proposed Project site is not anticipated due to the lack of developable land in this part of the County.*” is not accurate given the current GPA application for the Harmony Grove Village South project, and other large properties in the vicinity. This statement should be revised to include consideration of the impacts to this pending project and others that might follow in HG, Eden Valley, and, importantly, elsewhere throughout the County. Full impact of the unprecedented concept of developer-initiated community boundary changes throughout the entire unincorporated county should be analyzed.

The second sentence begins “*Based on concerns regarding residential housing shortages...*” Please provide evidence-based support for this statement. This statement is in direct conflict with the State-mandated 2015 Annual Progress Report, which states that the San Diego County General Plan provides adequate housing capacity to meet the Regional Housing Needs Assessment (RHNA) for the fifth housing element cycle. In addition, this section describes employment and commercial opportunities in nearby cities, but does not describe the immediate area, namely, the over 125-year old rural community of HG where N5 is located. Please add a description of the local community to orient the reader to the potential impacts of removing, urbanizing, and densifying N5 in this project. Further, the sentence, “*It brings a variety of residential uses to an area experiencing housing shortages, and places them in proximity to similar uses, necessary utilities and work opportunities, thereby reducing “leap frog” development, urban sprawl and increased traffic congestion as residents of far-flung communities compete for access to centralized resources.*” is misleading in several ways:

R-F-33 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-F-34 The comment indicates that this action could be precedent setting for other parts of Harmony Grove is not fully understood. First, the statement regarding Figure 1-2 is correct. Review of the figure shows that there is very little developable land in the EFHG Subarea. Most properties already have homes, are very small in size, or are already in large open space preserves, such as Elfin Forest Recreational Reserve or the Del Dios Highlands Preserve. Second, in order for any potential precedent to be applicable, the future action would have to have analogous conditions. There is not another place in the EFHG Subarea of the SDCP where a large block of property is sandwiched between two cities (San Marcos and Escondido) and wholly surrounded by existing developed or approved and developing uses. Nor is there another situation where the community of Eden Valley is bisected by a plan boundary line; all the remaining portion of Eden Valley is within the SDCP. Please also note that the redrawing of Community Plan boundaries in general is not unusual. For instance, as recently as adoption of the current General Plan in 2011, the Project was located within the North County Metropolitan Subregional Plan area before the Eden Valley parcels were moved into the SDCP (including the EFHG Subarea). Accordingly, there was precedent for changing planning boundaries long before the Valiano Specific Plan project application was filed. Amendments proposed as part of private development projects, of note, similar to any General Plan Amendment, are subject to CEQA review. The County does not agree that every community plan and subarea should be permanently static. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis for a discussion on the County’s authority to process changes to applicable land use plans. The removal and reassignment of this particular parcel from one subarea plan and retention within the larger plan area is lawful and merited.

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- R-F-35 The comment states that the impact that a developer-initiated community boundary line adjustment could have on the entire unincorporated county should be fully analyzed. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis. As stated in Response R-F-34, there is no impact anticipated from this action to other projects. Additional requests would have to occur and that request would have to be considered growth inducing, before any such logical connection could be made. Absent known requests, such a concern is speculative at best, and does not require analysis under CEQA (CEQA Guidelines 15145).
- R-F-36 The comment cites a sentence located within the EIR discussion of Section 1.8.1, Growth Inducement Due to Land Use Policy Changes and Construction of Housing. The quote deletes the preceding sentence, which clearly states: "... the Proposed Project would be generally consistent with projected growth in both the County General Plan and the SANDAG 2050 RTP analyses [emphasis added]...". The statement was not a stand-alone argument for solving residential shortages based on General Plan housing projections alone, but rather addresses planning agency coordination regarding the best place to locate additional housing proposed under the local jurisdictional plans. No additional housing data are required.
- R-F-37 The comment indicates that the community where Neighborhood 5 is located was not described in the EIR. The immediate Project area is described in Chapter 1.0 in Section 4.1, Environmental Setting, which addresses both the Project vicinity as well as the Project parcels. Additional detail is provided in Subchapters 2.1, Aesthetics, 2.3, Agricultural Resources, and 2.4, Biological Resources. As such, existing conditions and the nature of the local community is fully explored in the EIR. Additional description is not required.
- R-F-38 The comment requests additional description of the community surrounding Neighborhood 5. Please see Response R-F-37. Additional information is not required to provide orientation for the reader.
- R-F-39 This statement provides context for comments R-F-40 through R-F-42, below.

COMMENTS

RESPONSES

R-F-40

R-F-41

R-F-42

- there is no demonstrated housing shortage according to SANDAG, as discussed below;
- “similar uses” such as estate residential, horse keeping, vineyards, family-owned farms currently in operation in HG and Eden Valley are not featured in the Valiano development and thus are not “placed in proximity.”;
- there is no evidence-based support for the statement that the Valiano development, with its suburban, clustered design and increased traffic would reduce “leap frog development, urban sprawl and increased traffic congestion” On the contrary, attempting to build 388 units in an area zoned for 118 after extensive analysis by staff throughout the General Plan Update process points to the opposite conclusion: project will introduce sprawl and increase traffic congestion. In fact, removal of N5 from the CP would greatly increase the likelihood of leap frog development. Lacking supporting evidence, these statements should be removed.

R-F-43

The reference to the planning that has led to the GP “these planning agencies specifically reviewed where best to place new population nodes, taking into account three primary criteria: employment and commercial opportunities in the vicinity; existing infrastructure; and surrounding residential densities.” has to be followed by an adjacent statement that the Project does NOT conform to these carefully designed plans, since it is asking for a GP Amendment, a Rezone, and a Tentative Map, all of which are in direct contradiction with the GP policies and land use map as to where density should occur. It would be extremely misleading to let the quote above remain unchallenged by the reality the Applicant is in fact NOT following the guidelines they extoll, of which the public reading this EIR may not be aware.

R-F-44

It is also inaccurate to state that “Suburban housing extends to the city boundaries in Escondido and San Marcos.” As stated above the San Marcos housing directly adjacent to and visible from the project is estate residential with the largest lots in the City. “County properties between the Project site and neighboring cities consist of suburban, agricultural or generally equestrian properties” is also inaccurate; in fact, County properties in Eden Valley and HG immediately adjacent to the Project are estate residential on one acre or more, not suburban, regardless of equestrian nature; even the homes in the Harmony Grove Village Project nearest to the Project are the largest lots in that development including some multi-acre parcels.

R-F-45

The Project needs to utilize the more accurate 388 dwelling units rather than 326 throughout in order for the public to fully appreciate the scope of the impacts projected.

R-F-46

The sentence “...because the Project would provide additional housing opportunities in a region in which construction of 388,436 new homes is forecast to be required by 2050, to accommodate a 40 percent growth in the regional population (SANDAG 2011).” seems to imply that SANDAG

R-F-40

Please refer to response to comment R-F-36 regarding consistency with local jurisdictional plans. Please refer to response to comment R-A-1 regarding relevance to the changes in the Recirculated Draft EIR.

R-F-41

The comment claims that the sentence from the EIR stating that the Project would place a “.variety of residential uses...in proximity to similar uses” is misleading because the Project does not propose land uses such as estate residential, horse keeping, vineyards, or family-owned farms. The sentence from the EIR does not, however, state that the land uses listed by the commenter are part of the Proposed Project. The statement in the EIR specifically refers to the placement of residential near other existing residential uses, as well as near “necessary utilities, and work opportunities.” It should also be noted that the Project does propose some larger lots and animal enclosures to allow for horse and market animal keeping (Neighborhoods 4 and 5), as well as improvements to an existing equestrian facility for public use. Additionally, the Project was designed to maximize retention of existing agriculture in Neighborhood 4.

R-F-42

The comment concerns leapfrog development, which is development that jumps over undeveloped property to place developed uses in currently open lands. Leapfrog development is more specifically defined by the County’s General Plan in Policy LU-1.2 as placing village density away from established villages or outside established water and sewer service boundaries. This Project is not a leapfrog development, but can more appropriately be considered infill, as it would place additional development in an area surrounded by development (including a village), without pushing into pristine open space east of the major transportation corridors, and within or immediately adjacent to existing water and sewer service boundaries. Therefore, the Project does not meet the definition of “sprawl.” The Project will be consistent with General Plan Guiding Principle 2 that promotes new housing locations proximate to existing infrastructure, services and jobs. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis. Please also see Subchapter 3.1.4 of the EIR for the evidentiary support for the statement it would reduce leap frog development, urban sprawl and increased traffic congestion”.

Regarding traffic, the Project would result in traffic impacts in both the County and City of Escondido. Mitigation has been identified that lowers all of these impacts as addressed in Section 2.8.3 of the Final EIR.

R-F-43

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-F-44 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-F-45 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-F-46 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-F-46
cont.

2011 identified a housing shortage for the year 2050. In fact the 2050 Regional Growth Forecast (www.sandag.org/index.asp?projectid=189&fuseaction=projects.detail) was used to prepare the 2050 Regional Transportation Plan, Sustainable Communities Strategy, and the Regional Housing Needs Assessment for the fifth housing element cycle. The fifth housing element cycle covers an eight-year time period from January 1, 2013, to December 31, 2020. And as stated earlier, the current San Diego County GP is documented as adequately meeting the predicted housing needs for this period. Therefore, at present there is no demonstrated need for increased housing in San Diego County and statements of future need are purely speculative. This sentence should be revised to reflect this fact, or the EIR needs to provide evidence that official housing supply analysis from SANDAG is incorrect, and replace it with similarly unbiased data to that effect.

R-F-47

It is blatantly misleading to state that “As described in the introduction to this section, the planning agencies with responsibility for siting development have laid out a plan for this part of the County with which the Proposed Project is generally consistent.” If the Project were consistent with the plans the County developed at great taxpayer expense, it would not need to ask for an exemption from current policies in the form of an Application for an Amendment and Rezone to these very plans. It is *not* consistent with the GP to site 388 units where 118 have been carefully planned. As such this language needs to be removed as it may mislead readers and decision makers as to the consistency of the Project with the GP. It is an oxymoron to state that a GP Amendment is consistent with the GP, because if approved it will modify the GP for the area.

R-F-48

1.8.4 Growth Inducement Due to Extension of Public Utilities

The DEIR states that because the on-site WTWRF would accommodate only the project, it cannot be considered to be growth inducing. But because the HG CP currently prohibits sewer service, removal of N5 would allow, for the first time, provision of sewer service into the HG area beyond the Village limit line, and therefore should be evaluated for growth-inducing potential. As stated earlier, the capacity of the proposed facility needs to be analyzed with 2016 assumptions, not 2006, which may result in an oversized facility capable of serving residences outside the project footprint. In addition, the project also proposes a possible connection to the Escondido sewer system and thus would bring public sewer service into an area currently serviced only by septic systems (See December 2016 MOU). This would constitute a growth inducement by extension of a public utility and the impacts need to be fully disclosed. The third sewer system alternative the project proposes is an expansion of the HGV wastewater treatment plant, a typical example of a growth-inducing impact. That third option should also be fully analyzed in the FEIR, especially because the Rincon Del Diablo Programmatic EIR relies on the

R-F-49

R-F-50

R-F-47

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-F-48

Please see Response R-F-14e. Specifically regarding growth inducement and provision of a new utility, the commenter cites the EIR discussion on this topic. The potential for growth inducement related to sewer provision is properly addressed in the EIR. Please refer to pages 1-29 and 1-30 of the Draft EIR.

R-F-49

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. Also see response R-F-48.

R-F-50

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-F-50 cont. impact analysis of the Valiano project under CEQA to evade the need to evaluate the growth-inducing impacts within their own PEIR.

Taken together, these conditions do not support the conclusion that this project is not growth inducing.

R-F-51 **Table 1-3 Proposed Amenities should include maintenance mechanism/funding**

R-F-52 **Figure 1-2 Aerial Vicinity Map**

Eden Valley and HG should be labeled Large Lot Residential, instead of Single-family homes, just like the area North of Project, to reflect the reality on the ground, and demonstrate the Project is introducing suburban and urban densities sandwiched by Large Lot Residential.

3.1.4-26 Vehicle Emissions

R-F-53 It is curious that while the *SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (2002)* specifies 7.9 miles per trip as an average trip length (ATL) throughout the county, including trips for residents within the city of San Diego and other less excentred neighborhoods, the ATL for this community was calculated to be less, at 7.05 miles. While an Appendix does list the detail of how such a number was derived at a road level, CEQA does require that data provided be reasonably understandable by the public, which a multi-page list of roads does not meet as a standard. The EIR instead needs to clearly disclose the assumptions behind the model as far as where employment, entertainment and shopping centers for residents would be situated in 2021, when the project starts selling, and the basis for such assumptions. The EIR also needs to include a graphic clearly showing by driving distance, not radius, how far 7.05 miles would lead from the project, which would be easier for the reader and decision-makers to evaluate as to the reasonableness of the assumptions behind the model. Given residents are driving at least 2 or 3 miles depending where in the community they live just to get to the freeway, they only have a balance of 4 or 5 miles to make it on average to work, school and entertainment. It seems unrealistic at best to assume 100% of the residents will work, recreate and shop within that radius, when the larger employment centers are located well South of the Project as evidenced by the traffic patterns on I-15 at rush hour.

R-F-54

R-F-55

R-F-51 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-F-52 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-F-53 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. Also see response to comment R-F-56.

R-F-54 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-F-55 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-F-56 The accuracy of this ATL analysis is especially crucial because the Project as described barely meets the threshold for compliance with the GHG threshold of Significance:

- o The suggested threshold as calculated by Helix is 4.6 MT CO2e/sp/yr
- o The analysis estimates Project would emit 4.607 MT CO2e/sp/yr, rounds down the result to the target threshold, and asserts the project meets the requirement for insignificant impact
- o If as little as 0.043 MT CO2e/sp/yr of additional emissions, less than 1.0%, is unaccounted for in the analysis the total emissions will be 4.65 MT CO2e/sp/yr and, rounded up per mathematical standard practice, will be greater than the threshold and, therefore, constitute a significant impact.

3.1.4-43 Physical Division of a Community

R-F-59 The DEIR asserts “...*there is no existing community to divide.*” This statement is supported by the observation that there are no schools, stores, or post offices. However, these amenities are typically absent in rural communities. N5 is located within HG, the oldest of the San Dieguito communities, first shown on the 1889/1891 San Luis Rey 15' USGS topographic maps; a community with established boundaries documented in the County-approved CP; an established citizen’s representative group, the EFHG Town Council, which includes all property owners in the community, distributes a newsletter and holds regular elections and public meetings; The Fellowship Hall of the Harmony Grove Spiritualist Association, a private facility that has served as a meeting room for area residents on many occasions in the past, including hosting the County Visioning Workshops for the development of the HGV concept; and the Johnston-Ward Farmhouse, which has been dedicated to the community for use as a meeting place. The Heritage Gallery on the first floor houses historic artifacts and old photographs of the community. Thus unlike as asserted in the EIR, there is a vibrant and historic community at risk of being divided, and the removal of N5 would physically separate those residents living along Mt Whitney Road from the remainder of HG. This issue should be fully analyzed in the DEIR and the conclusion that “*no impacts are assessed to physical division of a community.*” must be better defended or revised.

3.1.4.17 Emergency Access

R-F-60 Please disclose and analyze consistency with cited Policies LU-6.10, LU-12.2, M-1.2, M-3.3, M-4.4, S-3.5 and S-14.1, given that unlike what is stated in EIR “*The Project would be consistent*

R-F-56 The comment is concerned with the accuracy of the ATL analysis. The standard of practice to calculate vehicle miles traveled (VMT) and average trip length (ATL) in the San Diego region is to use the SANDAG traffic model. The traffic engineer, LLG, used this model to estimate the project VMT and ATL. The SANDAG Series 12 Model was run assuming the existing on-the-ground land use and network conditions. The City of Escondido planned Citracado Parkway extension from Anderson Drive to Harmony Grove Village Parkway was not assumed. A site specific SANDAG Select Zone Assignment (SZA) model run was conducted for the Project Traffic Analysis Zone (TAZ). The results of the SZA were based on Project access locations, characteristics of the roadway system, and the location of residential, commercial and employment opportunities in the surrounding area. The model run provided data disaggregated into two categories: 1) vehicle miles traveled and 2) Average Daily Project Traffic Volumes. These two data categories were used together to calculate the average trip length.

The total daily vehicle miles traveled generated by the Project is 26,691 miles. The total daily traffic (ADT) generated by the Project is 3,786 trips. The total VMT is then divided by the Project ADT to arrive at the ATL of 7.05 miles per vehicle trip.

R-F-57 The comment is concerned with the accuracy of the emissions estimate. Standard mathematical practice is to round all final values to the same number of significant figures as the least accurate value. In this case, the least accurate value is the threshold itself with one significant figure following the decimal point. As stated in the comment, the analysis estimated the Project would result in 4.6 MT CO2e/sp/year, which did not exceed the threshold being applied to the analysis at that time. However, this threshold is no longer relied upon to determine significance. Please see response to comment R-D-5, the Topical Response: Greenhouse Gases Analysis, and the Supplemental Memo for the Valiano Project Environmental Impact Report Appendix J Greenhouse Gasses Analyses Report for a more detailed discussion of the current project-specific threshold being applied to the Project.

R-F-58 The commenter makes the assertion that if emissions were to increase the Project would result in a significant impact. While this is true for nearly every project, the results of the analysis are accurate. Please see response to comment R-F-58 and R-D-5 and the Topical Response: Greenhouse Gases Analysis for a more detailed discussion of the current project-specific threshold being applied to the Project.

R-F-59 If the comment addresses the statement on page 3.1.4-24, the quote is a misstatement. The Draft EIR text on page 3.1.4-24 reads “there is no existing community on site [emphasis added] to divide.” Thus, the quote omits the crucial qualifier “on site.” Just one sentence above that is the statement: “In summary, the existing Proposed Project area is described as a semi-rural community [emphasis added].” Similarly, the reference on page 3.1.4-43 starts by referring back to the prior discussion. The opening

R-F-59
cont.

sentence of the paragraph is: “As stated above, the existing Proposed Project area is described as a semi-rural community [emphasis added].” It was not intended for these comments to reflect the adjacent properties within the Eden Valley. The sense of community in Eden Valley is well understood. Despite it being located within a community, however, the current Project site, as referenced in the text on Draft EIR page 3.1.4.-24, is not a community in the traditional sense. Instead, the existing property is agricultural in nature, and has two homes for on-property residents.

As noted in the comment, the issue is one of physical division of a community. Development of the Project at the proposed site, which is located at the edge of the EFHG community and neither contains a community gathering locale nor makes one more difficult to access, will not result in a division of a community. It does not constitute a community gathering locale (such as may be found at a library, or the Elfin Forest Fire Station, or a community center or school). Because the Project itself (which is located at the western edge of the EFHG community adjacent to steep slopes and the City of San Marcos) does not contain a community gathering locale and does not make one more difficult to access, the Project would not result in a division of a community. Rather, the improved roadway, public park and trail connections to other parts of the valley system would improve access between and among all area residents, and would support, rather than divide, the existing community interaction.

Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis for a discussion on the physical location of Neighborhood 5 relative to the remainder of the EFHG Subarea plan and its physical connection to adjacent properties outside of the EFHG Subarea boundaries. There is no intent to minimize and the Project will not minimize the sense of community experienced by residents of Eden Valley, Harmony Grove Valley, and Elfin Forest. No revision is necessary to either of these statements.

The concept of community is one that is not defined by a planning document. As correctly indicated in the comment, it relates more to how people “feel” about their neighborhood. Do they attend community meetings? Read the local newsletter? Visit for shared experiences? None of these elements are affected by the name of the town, or planning document that addresses the area – they are the result of how people interact and live their daily lives within a specific area. In this instance, the improved roadway, public park and trail connections to other parts of the valley system would improve access between and among all area residents, and would support, rather than divide, the existing community interaction.

Please see Response R-E-20 for a discussion on CEQA requirements related to community character. It is important to note that, contrary to this comment, “social impacts,” like those associated with a sense of community, need not be analyzed in the environmental document as it is not an environmental impact.

COMMENTS

RESPONSES

R-F-60
cont.

with these policies by (...)providing multiple access points to the Project and an interconnected roadway network”, all the project access points lead to one single two-lane road operating at LOS F.

R-F-60

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.

3.1.4.19 Wildland Fires

Because this project would introduce urban densities at the Wildland Urban Interface in a valley prone to wildfires, with only one two-lane road already operating at LOS F, with another 200 or so existing residents also trying to evacuate in case of emergency, many with horse trailers, the DEIR needs to fully analyze and disclose impacts of likely evacuation scenarios in the event of an emergency. The roadway improvement mentioned of restriping Country Club Road at Auto Parkway is likely to have zero impact on the ability for residents to evacuate. We suggest the Applicant conduct a full scale fire drill with fire and safety personnel simulating an emergency, and the results be incorporated in the FEIR for evaluation by decision makers, before the project goes to the Planning Commission. Given the extreme fire risk and the attempt to place close to 4 times the density in a valley that has already had trouble evacuating its current residents, this simulation exercise may be the only way to meet CEQA to fully disclose potential impacts on the life and safety of current and future residents.

R-F-61

R-F-61

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.

3.1.4.3 Cumulative Impact Analysis

The unprecedented removal of N5 from its CP for the stated purpose that “*Neighborhood 5 would no longer be subject to any of the requirements set forth in the Elfin Forest Harmony Grove subarea portion of the San Dieguito CPA, and no potential land use impacts would occur*” could constitute a model for other applicants County-wide to use for any projects inconsistent with their associated CPs. As such, the conclusion that “*cumulative impacts associated with land use and planning would be less than significant.*” is not supported, because impacts have not been analyzed nor disclosed. The far-reaching impacts of a developer-initiated removal of a portion of an existing community from its approved CP in the face of strong community opposition should be thoroughly studied for potential cumulative impacts throughout the unincorporated County.

R-F-62

R-F-62

The comment is concerned with the removal of Neighborhood 5 from the EFHG Subarea. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis. Please also see Response R-F-34 regarding the nature of plan boundary modifications and the unique nature of this project. Because: (1) the modification to the Community Plan addresses only property that would be developed by the Project, and does not apply to any other area, and (2) any similar request proposed as part of an amendment by a private party applicant would receive scrutiny on a project by project basis as part of routine CEQA review, modifications to plan boundaries are not anticipated to have any significant cumulative impact. No additional study is required.

Please see Response R-G-36 for a discussion of community input and land use plans.

Deletion of References to the Community of Eden Valley is Misleading

R-F-63

COMMENTS

RESPONSES

R-F-63
cont.

We note that the revised EIR strikes out the name of Eden Valley in several sections (at 1-1, 1-22.1.3, 3.1.4-27,3.1.4-28, among others), in an apparent effort to deny its very existence. This is misleading for readers and decision makers who might not be aware that the project straddles two existing historic communities, each with a strong defined community character. The redacted text should be reinstated in FEIR or the impact of deleting it analyzed and disclosed.

Conclusion

R-F-64

Given the concerns with impact analysis and disclosure stated above, the conclusion that “*the Proposed Project would have less than significant impacts related to land use and planning*” should be revisited and withdrawn unless further evidence-based support can be provided.

R-F-65

In closing, we strongly oppose the removal of N5 from the EFHG planning subarea, both because of the impact on the local community and the precedent -setting nature of a developer-initiated change in community boundary definition.

Sincerely,

Douglas Dill

Chair, Seat 15

San Dieguito Planning Group

R-F-63

The comment is concerned with the strikeouts of text that referred to Eden Valley in the EIR. There is no intent to deny the existence of Eden Valley. The (identical) amendment on pages 1-1 and 1-22 was to correct an impression that Eden Valley was separately addressed as a subarea in the Community Plan, and to highlight the fact that there is such a subarea addressed for Elfin Forest/Harmony Grove. The figures cited on page 1-22 (including the aerial on Figure 1-2) make it very clear exactly where the site is located. The sense of privacy and physical separation valued in Eden Valley is noted on page 1-18, and growth inducement in the Eden Valley area is addressed by name on page 1-27. The two corrections on pages 3.1.4-27 and 28 amended overstatements in the Draft EIR that made it look as if all of Eden Valley would be developed by the Project. This is not the case. All parcels to the north, east and south of the Project in the valley would not be affected by the movement of the boundary line as proposed. The community of Eden Valley is explicitly referred to on page 3.1.4-3, and the character of Eden Valley is specifically referenced on page 3.1.4-29. The corrections, and the retained text, are appropriate. Environmental impacts would not result from this text edit, text does not need to be reinstated, and additional analysis based on the cited corrections is not necessary.

R-F-64

The commenter disagrees with the land use and planning impact conclusion in the EIR. The conclusion that the land use and planning impacts would be less than significant under CEQA is correct and does not require revision or additional analysis.

R-F-65

The commenter reiterates concern with the removal of Neighborhood 5 from the EFHG Subarea. Comment noted.