



20223 Elfin Forest Road
Elfin Forest, CA 92029

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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,

A handwritten signature in dark ink, appearing to read 'Jacqueline Arsivaud', with a stylized, overlapping scribble at the end.

Jacqueline Arsivaud, Vice-Chair

CC: Beth Ehsan, Maggie Loy