

June 15, 2015

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Re: Valiano Specific Plan, SCH NO. 2013061042—Public Comments on Draft Environmental Impact Report

Ms. Ehsan and County of San Diego Planning & Development Services Staff,

Thank you for giving us an opportunity to comment on the DEIR request for a 380-Unit residential subdivision (326 + 54 2nd dwellings = 380) referred to as Valiano. We live at 1023 Country Club Drive in Eden Valley. Our home abuts Neighborhood 3 (APN 232-492-01), and is two lots east of Neighborhood 4 (APN 232-113-01 & 02), and our view extends south to a large portion of Neighborhood 2 (APN 232-113-01). We have lived here for over 14 years. We know you will be receiving detailed reviews of the DEIR from several community groups, including ours (Friends Of Eden Valley) an the EFHG Town Council's combined efforts. We concur with these community groups' findings of gross deficiencies and omissions in nearly every section of the DEIR, and will instead ATTEMPT to concentrate our comments from a more person impact stance.

When my husband retired from the US Marine Corps, we searched for our retirement home in an area which includes horses. The Animal Zoning was one of the major criteria we based our home searches on. With the Valiano project as currently proposed, the conversion of currently predominately vacant land in our valley to urbanized uses (paved roadways, graded lots with buildings, etc.) represents an irreversible loss of existing Equestrian capable lands. These losses are incompatible with the current residents Community Character and Existing uses. In a situation where the urban area encroaches on the rural areas, incompatible issues arise such as farm noises, smells, and sounds. Ultimately, the rural voices are always chased away. This is not addressed in the DEIR.



We ask that the following mitigation be required of the applicant:

- Enlarge the number of lots to properly accommodate horse keeping on the majority of the project by reducing the number of allowed lots to the existing general plan, and eliminating the 54 second dwellings.
- Change the name to **Valiano Ranch** to better reflect the Equestrian lifestyle, both on-site and off-site.

AZ-1 Thank you for your comments. Based on your letter and review through Google Earth, your property is located north of Neighborhood 3 and looks south on to Neighborhood 3. Your near view is of a sloping area containing an entry drive, with barns/sheds, enclosures and related outbuildings on either side. Your view of the Project over the east-west access road and of an area that is oak woodland in a protected biological open space easement (see EIR Figures 1-11, *Open Space and Recreation*, and 2.4-10a, *Biological Open Space*). The four lots that were shown as abutting the northern boundary of Neighborhood 3 in the DEIR to the west of this open space have been deleted from the Project, so that all Neighborhood 3 Project lots would be located in the southern half of this parcel. Although there may be elements of built environment visible from the north, the closest Project views from your property would be of the open space and retained oaks. The remainder of the responses below address your specific comments.

AZ-2 As a Semi-Rural development, the Proposed Project would be compatible with adjacent land uses (see Response G-6). Please see Response AL-31 regarding equestrian-capable lands. Noise from adjacent farming activities would not be considered a significant source of impact. The potential for odors associated with manure, as well as existing sounds associated with livestock (including poultry) would be clearly spelled out in purchase agreements if the Project is approved (see Design Consideration 7.2.2, number 2, which addresses implementation of the County Agricultural Enterprises and Consumer Information Ordinance).

AZ-3 As explained in the previous comment response, the EIR concluded that there would not be a significant impact from the Project regarding horse keeping lots, therefore mitigation would not be required. To the extent possible, equestrian lots have been incorporated into the Project design. The Proposed Project would have 49 wider and deeper lots that would

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- AZ-3
cont. allow for horse and market animal keeping. One of the alternatives analyzed, the General Plan Density Alternative, would have horse keeping available on all lots. However, this alternative would not meet all Project objectives. Section 6156x of the Zoning Ordinance allows Accessory Dwelling Units on lots conforming with zoning with or without animal designators, although administrative permits are required in some instances. This applies to certain lots in Valiano (through the Specific Plan) and to all lots in the Eden Valley area.
- AZ-4 There is not a significant impact from the Project regarding the Project name, which is not a CEQA issue, and this would not be considered a CEQA mitigation measure.

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Project Alternative:

The DEIR fails to analyze a realistic alternative project, on or off-site. A plan that follows the current General Plan has markedly less impacts. Utilizing the GP zoning and existing community plan could reduce land use impacts, and would eliminate much of the widespread opposition from the local residents and other groups. As an alternative project, provided greater analysis using the current maximum number of dwellings possible under the current General Plan, with the lots designated for Horse Keeping.

A revised EIR must evaluate a version more in line with the existing community character OR relocation of the project to an area within the City of San Marcos or the City of Escondido where this type of project would be acceptable and possibly even welcomed.

Landform/Aesthetics:

The amount of landform modification for the proposed hillside lots on of the subdivision should be reduced due to the large amounts of granite base. 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, the proposed lot sizes bordering existing homes are not consistent with other planned residential developments within the area. A revised EIR must evaluate a version more in line with the existing community character.

Noise

The DEIR appears to review noise primarily from the traffic standpoint. Further review of the project does not address the added noise that will be produced once the conversion occurs of currently predominately vacant land in our valley to build out for urbanized uses (paved roadways, graded lots with buildings, etc.). These need to be addressed.

M-N-9: *Any livestock showing distress from blasting activity AT ANY DISTANCE...* This is the most unrealistic thing ever! With Coronado Hills to the West, and Hidden Hills to the East, Eden Valley is the valley floor with a "bowl-like" topography in which sound travels and echos much further than the allotted distances of 300 or 600 feet. There are approximately 164 horses in Eden Valley.

- A more realistic alternative to moving the horses each day prior to blasting must be analyzed in greater detail. Horse naturally have better hearing and greater instinctual "fear flight" reactions that humans. The stress of blasting, or moving to an alternate location sets these animals up for higher risk of injury, risk of Ulcers, and/or risk Colic which can ultimately result in death. Horses are not like dogs and do not adapt to new situations quickly.

Traffic

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. Applicant should be held responsible for creating proper line of sight for all applicable off-site private road easements for health and safety reasons.

AZ-5 The EIR analyzed a reasonable range of alternatives. The comment suggests utilizing the existing General Plan designation; this was analyzed in the General Plan Density Alternative (see Subchapter 4.3). Off-site location alternatives were analyzed in Subchapter 4.1, but were rejected because (1) the Project property was purchased with the intention of developing the site with a density similar to surrounding properties; and (2) it is unlikely that an alternative site in the County would substantially reduce significant environmental effects relative to the Proposed Project given the size of the parcel and type of development.

AZ-6 The Proposed Project does not have a significant, unmitigable impact to community character, and therefore CEQA does not require analysis of an alternative to reduce that impact. While a community character alternative would not be warranted, the General Plan Density Alternative covers many of the same aspects that a community character alternative would, and subsequent to public review, one group of neighbors indicated they prefer the General Plan Density Alternative over adding a new alternative with more flexibility in lot sizes. This modified alternative is discussed under Subchapter 4.3. The added information clarifies and amplifies the EIR conclusions and is not important new information that would require recirculation of the EIR under CEQA. See Response AZ-5 regarding the suggestion for an off-site project alternative.

AZ-7a See Response AF-22 regarding landform modification and grading.

AZ-7b Off-site lots to the west are within the City of San Marcos. The transition between Project and westerly lots also requires consideration of relative elevation, abutting uses and intervening structures or vegetation, all of which play a role. As analyzed in EIR section 2.1.2, the Proposed Project would be closer to the homes to the west than existing developed uses, but would be visually consistent with other seen elements in the viewscape. The separation of the Project from abutting lots on the west side of the Project is not only horizontal, but vertical. This results in many views from higher elevations being oriented over the Project, and encompassing a much larger viewshed, including developed portions of San Marcos, Escondido, and points northeast. From points closer to the Project in the valley, the EIR details the substantial shielding provided by buffer landscaping (see VIA Figures 13a through 13e and EIR Figures 1-25, 1-26, and 1-27a through 27c and 2.1-6).

AZ-7c Although the Proposed Project would result in an increase in density on the parcels being built upon, as demonstrated throughout the Project VIA and EIR, Project development would not be highly visible from public off-site viewpoints, and would largely be screened by buffering landscaping and/or attenuated by distance from the viewer. Information regarding

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- AZ-7c cont. the variation of Eden Valley lots is provided in Responses K-11b and AD-3. Details as to buffering of Project lots from adjacent development in the valley are provided in Subsection 2.1.2.1 of the EIR. Also as discussed in the EIR, for viewers further to the east (and again on more elevated parcels), the distance of the viewer from Project neighborhoods, and intervening developed uses and vegetation, as well as the visible mix of lot size and content when one looks over visually accessible valley portions of the view, combine to render the Project visually consistent overall with the mix of development combined with extensive areas of open space. The presence of the much higher hills that pull the viewer's gaze upward toward the notable ridgeline to the west also contributes to minimizing mid-valley development features. The current EIR provides adequate discussion of the variation between abutting lot sizes and those of the Proposed Project, as well as community character issues.
- AZ-7d See Responses G-2 and K-11b Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis regarding community character.
- AZ-8 Non-transportation-related operational noise impacts from the Project are discussed in Subsection 2.6.2.2 of Subchapter 2.6, Noise, of the EIR. The impact discussion analyzes stationary noise sources in accordance with the County's Format and Content Requirements for Noise Analysis and the Noise Ordinance, including residential air conditioner equipment and equipment noise from the WTWRP. Mitigation measure M-N-3 requires a noise barrier if a residential air conditioning condenser is installed within 35 feet of a property line to reduce noise levels to 45 A-weighted decibels (dBA) LEQ. Mitigation measures M-N-4, M-N-5, and M-N-6 would reduce noise levels from the WTWRP to less than significant levels.
- AZ-9 See Response K-149b with respect to potential impacts to livestock and a Project alternative that minimizes grading and blasting.
- AZ-10 At intersections where the Project would be adding sizable amounts of traffic to the roadways that are connected to Country Club Drive (Mt. Whitney Road, Eden Valley Lane, Hill Valley Drive, and the two entries in Neighborhood 5), sight distance analysis has been completed and improvements, if required, would be incorporated into the Project prior to completion of grading. Additional analysis is not necessary where the Project adds very small amounts (fewer than 40 ADT) of traffic to existing private roads/easements that intersect Country Club Drive (e.g., Surrey Lane and Milpas Drive).

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AZ-11 There does not appear to be a report addressing project construction traffic impacts. The short term impacts of constructing the project with roads which are posted Traffic Calming area, as well as posted Equestrian usages needs to be addressed. Low speed limits and limited construction traffic hours would be favorable.

AZ-12 The Sprinter rail line at Nordahl/Auto Parkway intersection presently causes major impacts and back-ups in traffic far past the light at Country Club Drive. The Sprinter is due to "double track" in the near future which will make these impact even worse. This area was not included in the traffic analysis, yet it is key for both Commuter Traffic and during a Fire Evacuation for the project area. The area needs to be analyzed in great detail.

AZ-13 During construction AND completion of the project, the adequacy of the existing roads to accommodate the evacuation of the area during both a fire and a Wild Fire Storm situation was not addressed in this report. The recent Coco's Fire (May 2014) which covered approximately 90% of the proposed project site identified multiple problems evacuating area. This needs to be analyzed in great detail, and a plan needs to be prepared and approved prior to the approval of the project.

Fire

AZ-14 As noted in the Valiano FFP, "as the density of structures and the number of residents in the interface increases, potential ignition sources will multiply and a large wildfire occurrence increases". Allowing 20 lots to fall below the 150-foot defensible space requirement (7.2.10 - #4) from the San Marcos Fire Department put the existing residents as well as the future residents at server fire risk. Making larger lots in the affected area with the proper 150-foot defensible space would eliminate this issue.

AZ-15 It appears that the Fuel Modification Zone in several areas actually overlaps the required buffer for wetlands and other bio RPOs. Impact of reducing either RPO buffer and/or FMZ need to be fully analyzed in a revised EIR since either fire safety or bio resources would be compromised if the zones are one in the same or encroach on each other. These need to be better define.

The DEIR states there have been no fires in the past 50 in this area. I know this has been commented on by SEVERAL different agencies...so I'm not even going to touch this one!



1023 Country Club Drive (May 2014)



2820 Whitney Road (May 2014)

AZ-11 See Response K-156 regarding construction traffic.

AZ-12 See Response I-61 regarding the SPRINTER and traffic impacts. The SPRINTER was included in modeling for fire response (see Response I-55). Regarding fire evacuations, see Topical Response: Fire/Evacuations.

AZ-13 See Topical Response: Fire/Evacuations regarding fire evacuation and AD-7 regarding analysis of the Cocos Fire in the FPP.

AZ-14 Although certain lots have fewer than 150 feet of defensible space, the Fire Protection Plan (FPP; Appendix L of the Final EIR) for the Proposed Project includes restrictions on specific building materials and methods suitable for building in high fire hazard severity zones as identified by CAL FIRE (even though the Project is located in a Moderate Fire Hazard Zone within the San Marcos Fire Protection Zone Map) and identifies a series of other items such as enhanced water supplies, automatic fire extinguishing systems (interior sprinklers for all homes and enhanced extinguishing systems/sprinklers for identified structures and fire deflection walls along the Project perimeter), non-flammable fire deflection walls, and roadway widths. Overall, the development includes a redundant layering of fire protection features that have been proven to increase ignition resistance of structures and landscapes and result in communities that are less vulnerable to wildfire. These features make the Project site less vulnerable to wildfire and reduce the fire risk for both existing and future residents. The goal, too, is for all structures to survive a wildland fire on their own, with no structures or lives lost, and with minimal intervention from firefighting personnel.

AZ-15 The FPP addressed this comment in Section 4.5. Fuel modification does not encroach or impact the Resource Protection Ordinance (RPO) wetlands or wetland buffers (50-foot RPO buffer).

AZ-16 Section 1.4.4 of the FPP has been revised to address past fires in the area. This information has also been incorporated into the EIR but the information clarifies and amplifies the EIR conclusions and is not important new information that would require recirculation of the EIR under CEQA.

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Air Quality

Unlike many typical “urban” communities, a large portion of the existing rural community residents work outdoor on their land daily. The substantial pollutant concentrations during construction will have adverse effects on the many horses, as well as the outdoor workers directly. This need to be analyzed and addressed in more detail.

The cumulative impact of project construction emissions needs to be evaluated and addressed 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.

The proposed project would result in a significant decline in air quality in Eden Valley which would be harmful to residents as a whole. The topography of Eden Valley frequently creates its own unique inversion layers. As stated in the DEIR (subchapter 2.2): *“Temperature inversions prevent air close to the ground from mixing with the air about it. As a result, air pollutants are trapped near the ground”*. While the applicant acknowledges in section 2.2 that *“In addition the proposed project would significantly contribute to cumulative construction and operational air quality impacts (Impacts AQ-2 and AQ-3)...short of reducing the project size, there are no feasible mitigation measure to reduce the project’s contribution to the less than considerable levels”*.

- We ask that the following mitigation be required of the applicant:
Reduce the construction air quality impacts by reducing the number of homes (as admitted by the applicant as a feasible mitigation measure) to no more than the number allowed under the general plan, and eliminating the 54 second dwelling units.

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 biological open spaces are small and isolated. 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. The proposed projects maps appear to isolate areas of biological importance and do not provide any wildlife corridors for movement throughout these areas. 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. Currently there is natural wildlife movement from the West on APN 232-013-02, down into the CA Oak preserve area on APN 232-492-01. The current proposal cuts this wildlife linkage off with proposed homes and a road, isolating the prime wetland feeding area.

- In an effort to preserve the natural wildlife corridor, consider extending Street 3A to meet with Street A, at or about the same intersection as Street 4A. Street 3B could be eliminated below Street 3D through the CA Oak area. As much of the lots #119, 120, 121 and 122 appear to fall into the RPO zone in addition to not meeting the 150-foot defensible space required by the SMFD, they should be removed from the plan. Additionally, eliminating Lots 205 – 209 would then keep the existing East/West wildlife linkage open.

AZ-17 Construction-related health risks from construction equipment were assessed in the Air Quality Analysis Report and presented in EIR Subsection 2.2.2.4. Using the USEPA SCREEN 3 model, diesel particulates emitted from construction equipment were modeled taking into account potential exposure of nearby residents during the duration of construction period. Both the potential cancer risk and the chronic non-cancer hazard index were assessed and the results were well below the County’s significance thresholds (0.008 in 1 million versus a threshold of 1 in 1 million for cancer risk and 0.012 versus a threshold of 1 for the chronic non-cancer hazard index). No change to the EIR was made in response to this comment.

AZ-18 The cumulative impact of Project construction emissions, taking into account other planned projects in the area, was assessed in Section 4.3 of the Air Quality Analysis Report and presented in EIR Section 2.2.3. As discussed in the report, the analysis determined that there would be a cumulatively considerable impact associated with emissions of volatile organic compounds, nitrogen oxides, and particulates.

Subsection 4.2.2.2 of the Air Quality Analysis Report and Subsection 2.2.2.2 of the EIR analyzed worst-case daily emissions in the years (2018 and 2019) where it would be expected that occupation of a neighborhood may occur concurrently with construction of another neighborhood. The emissions of criteria pollutants during those years would not exceed the daily thresholds for any of the pollutants, and no significant impacts would occur. No change to the EIR was made in response to this comment.

AZ-19 The comment reiterates the general description of the meteorology described in the Air Quality Analysis Report for the vicinity. The commenter is correct that inversion layers exist in the Project area. As described in Subchapter 2.2 of the Air Quality Analysis Report:
Throughout the year, the elevation of the temperature inversion within the San Diego Air Basin (SDAB) in the afternoon varies between approximately 1,500 and 2,500 feet above mean sea level (amsl). In winter, the morning inversion layer is about 800 feet amsl. In summer, the morning inversion layer is about 1,100 feet amsl. Therefore, air quality tends to be better in winter than in summer because there is a greater change in the morning and afternoon mixing depths, allowing the dispersal of “trapped” pollutants. Elevations within the Project area range from approximately 614 feet to 1,013 feet amsl. The finished grade would range from approximately 810 feet in the northwestern area to 685 feet in the southeastern area.

AZ-20 See Response K-26b with respect to Project alternatives with fewer residential units.

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- AZ-21 The term “Open Space” in this case encompasses not only biological open space, but also common areas which consist of HOA lots that include parks, common open space areas, detention basins, bioretention basins, and the wet weather storage, as well as landscape easements which include HOA-maintained landscaped areas on private lots. Proposed Biological Open Space areas do not overlap with backyard areas.
- AZ-22 Biological open space on site is for avoidance, not mitigation, and as such is not required to be connected. See Response K-32 for further discussion of wildlife movement through the site.
- AZ-23 See Response K-32 regarding wildlife movement. Following public review the Project was revised to move Street 3A to the south, eliminating an RPO wetland crossing. The change in the Project has been analyzed in the EIR and there are no new or substantially increased related impacts. Therefore, it is not important new information that would require recirculation of the EIR under CEQA.
- AZ-24 Proposed revisions to the site plan include removal of the north-south road crossing in Neighborhood 3, as well as associated lots (119-122) listed in the comment. The EIR and Biological Technical Report (Appendix E of the EIR) have been revised to incorporate this revision. The change in the Project has been analyzed in the EIR and there are no new or substantially increased related impacts. Therefore, it is not important new information that would require recirculation of the EIR under CEQA.
- AZ-25 See Response K-32 regarding east-west connectivity, which is also discussed in Section 6.0 of the Biological Technical Report. Although there is no significant impact identified for wildlife movement, the EIR does include a Biologically Enhanced Alternative (see Figure 4-6) that would eliminate the lots mentioned in the comment.

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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 within multiple project lots, roads and grading areas. Where oak woodland occurs adjacent to the wetland, the wetland buffer shall include the entirety of the oak habitat. The proposed development pattern must be reevaluated for impacts to the RPO setbacks and FMZ setbacks as they often appear to be one-in-the same on the DEIR. The area needs to be analyzed in great detail.

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 (APN 232-492-01), there is County mandate to the previous property owner in place, which indicates that onsite re-vegetation and enhancement is to be conducted. This in not mentioned in the DEIR and the applicant must 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. This was omitted from the DEIR and must be reviewed and a procedure put in place to ensure this happens.

Geology and Soils

As noted in the DEIR, there is the presence of soils with moderate or severe erodibility ratings. This will 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 the dirt easement passable for existing residents. Excess water from the wetland area in proposed neighborhood 3 is know to drain onto this off-site easement.

There is a very high water table in Eden Valley. The DEIR failed to mention that 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. This condition needs to be analyzed in greater detail.

Other Project Component Parts

- In Chapter 1, page 1-5, the review states that the 0.2 acre site will be reconfigured to allow a horse facility with trailer parking, an exercise ring and accommodate private horse boarding. How is this possible on only a 0.2 acre site? This needs to be corrected.

AZ-26 The biological open space areas include oak woodland where it is adjacent to County RPO wetland habitat, in compliance with RPO wetland buffer requirements. There are other areas of oak woodland that fall within the FMZ areas, but are outside the biological open space. There is no overlap of biological open space and FMZs.

The previous mitigation order associated with the oak clearing by the former property owner had been implemented, so that the portions of the mitigation area that overlapped with proposed Project's impacts are being mitigated (currently) as oak woodland habitat at a 3:1 ratio.

AZ-27 This comment is correct in noting (as outlined in EIR Table 2.10-1) that the Project site includes a number of soil/surficial deposits with moderate to high erosion potential. Pursuant to the discussion in Subchapter 2.10 of the EIR, the issue of potential erosion and sedimentation effects is provided in Section 3.1.3 of the EIR due to the relationship to water quality issues. Accordingly, as outlined in Section 3.1.3, proposed excavation, grading, and construction activities on the Project site and associated off-site (road improvement) areas could potentially result in related erosion and off-site sediment transport (sedimentation).

While graded, excavated and filled areas associated with construction activities are regulated and stabilized through efforts such as compaction and installation of hardscape and landscaping, erosion potential would be higher in the short-term than for existing conditions. Developed areas would be especially susceptible to erosion between the beginning of grading/construction and the installation of pavement or establishment of permanent cover in landscaped areas. Short-term effects from Project-related erosion and sedimentation would be addressed through required conformance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit and associated County standards. Specifically, this would include implementing an authorized NPDES/County Storm, Water Pollution Prevention Plan (SWPPP) for proposed construction, including the use of extensive erosion and sedimentation best management practices (BMPs) as identified in EIR Table 3.1.3-4.

Erosion and sedimentation are not considered to be significant long-term concerns for the Proposed Project (as developed areas would be stabilized through installation of hardscape or landscaping), although the Project would be subject to associated regulatory requirements under

AZ-27
cont. applicable County and NPDES Municipal Permit standards. As a result, the Proposed Project design includes long-term measures to avoid or reduce off-site sediment transport, such as: (1) retaining native vegetation and using extensive landscaping; (2) minimizing slope disturbance and providing slope protection/drainage structures; and (3) providing detention/water quality basins, bioretention facilities, energy dissipators, irrigation controls and drainage facility maintenance (i.e., to remove accumulated sediment). With respect to the noted area located north of Neighborhood 3, the Project drainage management design includes an extended detention basin in this area, which would remove sediment (along with other potentially associated pollutants) from storm water prior to discharge within/from the site. The proposed drainage management design is depicted on Figure 1-23 of the EIR, with a conceptual detention basin design provided on Figure 1-24.

Based on the implementation of the described (and/or other appropriate) short- and long-term erosion and sediment control BMPs in conformance with applicable regulatory standards, the EIR correctly concludes that potential Project-related erosion/sedimentation impacts would be less than significant. No change to the EIR was made in response to this comment.

AZ-28 The comment raises concerns regarding the presence of shallow groundwater and potential liquefaction concerns in the area north of Neighborhood 3. Potential liquefaction hazards were evaluated in the Project Geotechnical Investigation (Appendix K of the Final EIR) and EIR Subsection 2.10.2.3. As described in those analyses, the Project site exhibits generally low liquefaction potential (and is not located within a County-designated Potential Liquefaction Area), although portions of Neighborhood 3 were "...identified as exhibiting higher liquefaction potential due to the presence of granular alluvial soils and shallow groundwater." Because no on- or off-site structures or other improvements susceptible to liquefaction hazards are proposed in these areas, however, the EIR (and Appendix K) did not identify any associated significant impacts (although the Geotechnical Investigation notes that if development in such areas is subsequently proposed, "... special recommendations will be required."). It should also be noted that post-development drainage from Neighborhood 3 (or other on-site areas) would not flow into the adjacent off-site area to the north described in this comment, but rather would be directed into two extended detention basins in the eastern portion of Neighborhood 3, before continuing east and exiting the site along the eastern property boundary, similar to existing drainage (refer to EIR Figure 1-23, and the Proposed Conditions Hydrology Exhibit in the Project Drainage Study [EIR Appendix M]). Storm water flows in the northerly portions of Neighborhood 4, which drain through this area, would be reduced to pre-Project conditions by extended detention basins as described in the Project Drainage Study. In addition, Mitigation Measure GE-1 would implement a site-specific geotechnical investigation during Project grading to assess potential

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- AZ-28
cont. impacts related to seismically—induced settlement and related effects. All recommendations provided by the Project engineer/geologist to address potential effects related to seismically-induced settlement would be implemented as part of the Project design/construction efforts. As a result, any potential liquefaction or related hazards (e.g., flooding) in the described area north of Neighborhood 3 would be reduced by implementation of the Proposed Project.
- AZ-29 The equestrian staging site would accommodate the additional amenities by expanding to 1.2 acres. The redesign is discussed in the EIR, Subsection 3.1.6.2 and Chapter 1. Also refer to Figure 1-12. The changes made to the EIR do not require recirculation under CEQA because they do not result in new significant impacts or a substantial increase in impacts.

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- AZ-30 There is no mention of a MUP that would be necessary to run the proposed Private Equestrian Facility. According to County Standards, if any permitted land is not used for 1 full year, then that permit is no longer valid. The Harmony Grove Equestrian Center has sat vacant for well over 1 year. The applicant must now apply for the proper MUP or other applicable permit per the County Equestrian Ordinance.
 - AZ-31 Per the County Trails Map, the applicant is require to make the trail connections with the other regional trails. This is not apparent in the report. To the South, the trails must connect with the Harmony Grove Village trails. To the North, the trails must go through ALL of the proposed project parcel including APN 232-013-01 with the intent to connect with Jack's Pond in San Marcos. There will be a dedicated Ag easement on that parcel which should incorporate the Trail linkage. To the east, it is unclear where the trails will connect. It appears that trail in Neighborhood 3 connects to a private easement. There does not appear to be other locations where the existing residents can access the trail system at points throughout the project. This needs to be addressed.
 - AZ-32 The DEIR repeatedly uses the 326 number in the analysis sections which understates potential impacts. The Project would allow a certain number (54) of secondary units and should clearly state that true number is 380.
 - AZ-33 The amount of landform modification for the proposed hillside lots on of the subdivision should be reduced due to the large amounts of granite base.
- To address these components, we ask that the following mitigation be required of the applicant:
- AZ-34 Enlarge the number of lots to properly accommodate horse keeping on the majority of the project by reducing the number of allowed lots to the existing general plan, and eliminating the 54 second dwellings.
 - AZ-35 Change the name to **Valiano Ranch** to better reflect the Equestrian lifestyle, both on-site and off-site.
- In conclusion, we realize that there is continual pressure to put higher density residential this area beyond what is allowed by the General Plan Land Use Map. Our area residents will continue to work TOGETHER AS A COMMUNITY to preserve this historic 100+ year-old area by implementing the Village Development Pattern that was negotiated with County Staff and approved by the BOS in August 2011.
- We are not opposed to development in our area that is consistent with the existing General Plan. However, development is not supported if the proposed project:
- AZ-38 Would involve a significantly higher density than the approved General Plan
 - AZ-39 Would result in the loss of substantial Equestrian capable lands
 - AZ-40 Does not seek to embrace and preserve the Equestrian nature of the surrounding area
 - AZ-41 Would be a significant impact and is incompatible with the existing rural community character and existing uses.

Sincerely,
Janean & William Huston
1023 Country Club Drive
Escondido, CA 92029
858-735-0550

- AZ-30 The Project would no longer include an equestrian center, and a Major Use Permit would not be necessary. The Project now includes public parking for horse-trailers, access to the multi-use trails, and a horse exercise ring. The redesign is discussed in the EIR, Subsection 3.1.6.2 and Chapter 1. Also refer to Figure 1-12.
- AZ-31 The public trails would be built to County standards. These trails would connect to off-site public trails (per Harmony Grove Village Specific Plan; see Figure 1-18). A trail connection to the north through the agricultural open space was determined infeasible to the satisfaction of the County. The trail that touches the northeastern corner of Neighborhood 3 makes a loop around Neighborhood 3, and thus it would not be necessary to leave the Project site to use the trail. The connection to an off-site private road is intended as a convenience for existing residents who live along that private road and wish to enter the public trail system. The Project would provide trail connections to the edge of the Project, but is not required to create trails off site.
- AZ-32 The EIR and technical studies analyzed the impacts associated with the construction of 334 main units plus 54 Accessory Dwelling Units for a total of 388 units. The previous site plan had 334 units with 54 secondary dwelling units which was later reduced to 326 units with 54 secondary dwelling units. The documents represent a conservative analysis of 388 units since only 380 units are currently proposed. The redesign is discussed in the EIR. The changes made to the EIR do not require recirculation under CEQA because they do not result in new significant impacts or a substantial increase in impacts.
- AZ-33 Comment noted. The amount of landform modification has been avoided to the extent possible, but blasting would be required at certain areas.
- AZ-34 This is a repeat of comment AZ-3. See Response AZ-3.
- AZ-35 This is a repeat of comment AZ-4. See Response AZ-4.
- AZ-36 See Response AD-2 regarding the need for a GPA.
- AZ-37 See Responses I-3 and I-4 regarding application of the Community Development Model.
- AZ-38 See Response AD-2 regarding the need for a GPA as well as Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis. Note that although the Project would increase the density, it would still be a semi-rural density consistent with the Semi-Rural regional category, as is the current General Plan designation.

COMMENTS

RESPONSES

- AZ-39 The Project promotes equestrian use through the provision of an equestrian trail head area, equestrian staging area, and multi-use trail network. Neighborhoods 3 and 5 provide lots that would accommodate horses within the County's animal keeping guidelines. In addition to the multi-use trail network with connections throughout the existing and proposed communities, the former equestrian center site would be configured to allow public horse trailer parking and use of an exercise ring for the public to access the multi-use trail. See also Response AL-31.
- AZ-40 The EIR lists the Project Objectives. One of them is to design "a community that embraces and preserves the equestrian nature of the surrounding area and provide amenities for the equestrian community." See Response U-2a regarding semi-rural character including equestrian elements.
- AZ-41 See Responses I-7, and U-2a and Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis regarding rural character.