

COMMENTS

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of our areas. We have demonstrated we are willing to work with the County and developers to help craft plans that meets everyone's objectives.

County-led General Plan Community Workshops:

Members of all three communities (HG, EV and also EF) spent hundreds of hours working with County Staff in the early 2000's to develop a Community Plan that takes into account the unique and special nature of our community, as part of the General Plan Update process.

Recognizing that our community needed to absorb its "fair share" of the unincorporated county's projected growth, residents of all three towns worked with County Staff. In these workshops, they first evaluated different development patterns throughout the valley, and considered spreading the density over the entire area. Then they mapped out a plan for the area that was a fair compromise between the need to accommodate growth in the County, and the preservation of the rural character of the community. That plan is reflected in the approved General Plan as well as the Elfin Forest and Harmony Grove Community Plans, which include the Village Development Model (VDM) (later replaced by the Community Development Model).

The VDM establishes a denser village core featuring concentric circles of decreasing density so that the areas furthest away from the village core would be more in keeping with the surrounding area. The goal of this was to shield the existing community from the densely populated core and to preserve a rural/urban balance so that the rural voice would not be drowned out by the urban or suburban voices. It was meant to preserve our community character and to limit the effects of excessive density.

Harmony Grove Village:

The community (again, members of Eden Valley, Harmony Grove and Elfin Forest) banded together to work with the developer to make sure the project reflected the spirit and intent of our community plan as well as the GP. After many discussions and workshops with the developer, the county and members of the community, HGV was revised to take into account the VDM with precisely what was dictated in our Community Plan (the village core, feathering out to larger rural and equestrian lots at the periphery).

*The Valiano project places high density clusters of small properties immediately adjacent to larger lots that form part of the "feathering out" dictated by the Village Development Model. This would cause a significant impact and would alter the nature*

I-3  
cont.

Upon approval of the Project, Harmony Grove Village would remain as the defined village area, surrounded by semi-rural residential areas of varying densities, including the five neighborhoods of the Valiano Specific Plan. Valiano's semi-rural density is appropriate given its proximity to the large urban centers of San Marcos and Escondido with associated infrastructure. At the same time, the Project's semi-rural clustered design would reduce the development footprint, increasing the amount of open space, natural habitat, and agriculture that can be preserved, consistent with the intent of Guiding Principle #2. Please also see Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis.

I-4

See Response I-3. In addition, note that the CDM, which can be pictured as a compact village core encircled by concentric rings of lesser density, is intended to create a transition from the dense village core to a surrounding of rural lands. Rural lands are defined in the General Plan as open space and very low density lands, different from the semi-rural residential area of Eden Valley. The Project site does not lend itself to a neatly organized CDM structure for two reasons. First, the site is already surrounded by land ranging from semi-rural residential to urban in intensity, and thus cannot provide a feathered transition outward from the dense core of Harmony Grove Village to a rural periphery. Rather, it is more of an in-fill site surrounded by Harmony Grove Village to the south, Escondido to the east, and San Marcos to the west. Second, the site is comprised of a series of parcels laid out in a relatively linear north-south fashion, and thus the density cannot be centralized within the site in the same way it could be on a large block of land such as the Harmony Grove Village site. However, the individual neighborhoods are clustered on a smaller scale within the Project, which achieves the same overall goal to increase the amount of open space and stay closer to roads and utilities.

I-3  
cont.

I-4

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I-4 cont. of the community in irreversible ways. This impact was not evaluated in the DEIR and needs to be analyzed.

NC-17

I-5 This property has asked for up-zoning several times before. Originally, they asked to increase from RR2 to RR1. This request was granted. Then, during the Property Specific Request process, they requested up-zoning from RR1 to RR0.5, which was denied based on staff review.

Land Use: Community Character

com·mu·ni·ty  
kə'myoʊnədə/  
noun

noun: **community**; plural noun: **communities**

1. a group of people living in the same place or having a particular characteristic in common.

I-6 Eden Valley and Harmony Grove, despite the applicant claims<sup>ii</sup>, is and has always been an established, existing community. Both Eden Valley and Harmony Grove are characterized by relatively large lots of an equestrian, agricultural and rural residential nature. This refers to not only the look and feel of the environment (decidedly rural) but also the values of the people who choose to make this area their home. The residents of Eden Valley consider themselves a community; have regular community meetings and share values, have friendships and associations among themselves as well as with the wider Harmony Grove and Elfin Forest communities. By any and most definitions, this is a community. The insertion of 326 houses in a clustered formation into an area that has a rural character would create significant impacts to the existing residents as it would physically split the community as well as begin

We believe that splitting the community makes the impact. As such, the EIR should analyze and mitigate this significant impact.

Community Character: What is Rural?

I-7 We are a rural community and Valiano is not. It does not fit into our character at all. "What exactly is rural?" one might ask. You know it when you see it, but according to Webster's:

ru·ral 'roorəl/ adjective

I-5 Comment noted. This is not a CEQA-related comment.

I-6 The Project would not split the community since Neighborhoods 1 through 4 are situated between Eden Valley and San Marcos, and Neighborhood 5 is on the northern edge of proposed Harmony Grove Village. The Project's roadways and public trails would be open to all, as would the public park, thus creating additional connections for the community instead of a physical split in the community as claimed by the comment.

I-7 According to the County's General Plan Table LU-1, Land Use Designations and Compatible Regional Categories, the definition of "rural" is one home per 20, 40, or 80 acres. The existing area neighborhoods, therefore, are not rural by definition. Valiano does however contain elements of the rural lifestyle mentioned in the comment. There are allowances for animal keeping on a number of lots which bring with them the sights, sounds, and smells of a more rural lifestyle as the commenter desires. Outdoor activities are encouraged and incorporated into the Valiano Specific Plan area through the inclusion of trails and equestrian facilities which facilitates horseback riding, mountain biking, and hiking. Comment noted concerning neighbors who are "in it together," however this is not a CEQA issue.

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in, relating to, or characteristic of the countryside rather than the town. "remote rural areas"

Well, to us it is an overarching sense of community that comes from being slightly removed from the hustle and bustle of urban life. It is a visual, auditory and olfactory experience: Large lots with pastures, horse arenas, corrals, barns, animal pens and other out buildings as far as the eye can see. Domesticated animals, goats, horses, sheep, chickens, alpacas and even emus. The musky smell of horse manure, sage, eucalyptus, dry grass. The sounds of the country: horses whinnying, goats bleating, roosters crowing, red-tail hawks crying, cooper's hawks fighting, coastal gnatcatchers meowing, coyotes howling at night. Wildlife. Wild habitat. Open, undisturbed spaces. Split rail fences, white washed three rail ranch fencing as far as the eye can see. Dirt roads. Dirty vehicles. Pickup trucks. Tractors. Quads. Growing things, making things, being resourceful, working our land. Kids, splashing in streams, running outdoors, free, yelling, getting dirty, climbing trees, swinging from ropes, exploring. Outdoor junkies on mountain bikes zipping down single track trails. Horses on trails (and the occasional donkey). Trail runners, hikers, road bikers, triathletes. Independence: from traffic, from noise, from crowds, from the urban jungle, from the stress of modernity. Neighbors who are "in it together" sharing tips on farming, septic systems, wells, animal keeping, fire safety, wildlife, raising children in the country, all while leaning across a ranch fence. Tranquility, peacefulness, zen. THAT is what rural means to me.

I-7  
cont.

What Valiano is proposing is absolutely contrary to a rural lifestyle. Houses clustered together on cul-de-sacs, barely any space between houses. 1000 foot long walls up to 20 feet high. Manufactured slopes. Lots of cars. Paved roads, suburbanites unused to the sounds, sights and smells of a rural community. Impatience brought by traffic. Impersonality brought by walls and the houses jammed together which create a barrier despite the closeness. How many people in suburbia truly know their neighbors? We may not often see our neighbors because we live on large lots, but we have an intimate closeness that comes from surviving in the country; we would drop everything to help our neighbors evacuate their animals out during a fire (and many of us have). We look out for each other. There is absolutely no definition of rural that the Valiano proposal fulfills, not even with "rural themes" whatever that means. If Valiano is approved, "rural" will no longer apply to our community and it will die a slow death. This is not just a significant impact. It is a critical, existential impact.

I-8

I-9

I-10

The following specific comments supplement those made by The Elfin Forest Harmony Grove Town Council's attorney, Johnson & Sedlack. The DEIR fails to

I-11

I-8

See Response G-7 and Topical Response: General Plan Amendment and Boundary Line Adjustment CEQA Analysis regarding sewer The Project includes semi-rural elements which are similar to the surrounding area:

- Equestrian: The Project includes elements contributing to a "horse friendly environment," including retaining elements of the existing equestrian facility in the southeast corner of the Project for public use, promoting equestrian use through the provision of an equestrian trail head area, and multi-use trail network, and providing equestrian lots in Neighborhoods 3 and 5 that would accommodate horses within the County's animal keeping guidelines. This provides views to private corrals, and public horse paddocks, and horses using the proposed workout ring schematically represented in Figure 1-12 of the EIR.
- Walls: Walls within the Specific Plan area would be designed as low-profile rock and boulder walls similar to the surrounding natural landscape. Due to on-site topography, numerous retaining walls are proposed along Project roadways and within lots. Retaining wall heights would range between 2 and 20 feet and lengths would vary from 41 to 523 feet. Many of these walls would be interior to the site. Several fire walls also would be required for the Project. These would be solid 6-foot high walls unless they merge with a higher

l-8  
cont.

retaining wall, as is the case in one instance. As per Section 2.1.5 of the Valiano Specific Plan, walls shall be an extension of colors and materials of adjacent architecture and shall recede into the landscape rather than become a dominant visual feature. Therefore the walls are in compliance with N-1.3 of the County's General Plan.

- Country Roads: The majority of existing homes within the EFHGCP take access from paved roads. New water quality standards preclude the use of dirt roads.

- Open Space: The Project retains both biological and agricultural resources.

- Clustered Lots: EFHGCP Policy LU-1.5.1 allows for clustered lots through an approved Specific Plan to allow for significant preservation of resources. The GPA follows the guiding principles, and is consistent with the County of San Diego's General Plan.

- Agricultural Uses: The Project includes a Project Design Feature to establish a 35.4-acre agricultural easement area within the Project site. This Project Design Feature is not mitigation for any significant agricultural impact; it is intended to add to the character of the site and community. This easement would protect the availability and viability of the easement area for potential agricultural uses. Specifically, due to the 2014 wildfire event and intermittent drought conditions, the agricultural easement area could be used for other agricultural crops because avocado orchards typically require high irrigation levels. Rather, the easement area would be managed and maintained to ensure that it is available and viable for agricultural uses as noted, potentially including activities such as "stumping" the remaining and burned (dead) avocado trees; providing erosion, weed and rodent control; and maintaining the irrigation system used for previous agricultural operations. While no specific agricultural activities are currently proposed within the easement area, such uses may include avocados, vineyards and/or other orchards that require less irrigation (e.g., pomegranates and olives).

- Agricultural Easement: The agricultural area would be placed within an easement dedicated to the County and implemented directly through the HOA (i.e., by retaining a qualified manager/consultant/ operator), or through options such as leasing or selling the easement parcel to a third party for agricultural development. The agricultural easement would preclude development other than agriculture, uses incompatible with agriculture, and non-agricultural uses (with minor exceptions for agricultural-related uses and fuel management, if applicable). The agricultural easement requires that the land is available and viable for agriculture, as an agricultural/visual amenity for residents of the Project site and surrounding areas.

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- I-9 Comment noted. The sense of community experienced in the Project area is acknowledged. Knowing and helping one's neighbors is not a CEQA-related issue, however; nor is it a community character description of rural, semi-rural or village.
- I-10 See Responses G-6, I-7, and I-8. Please also see Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis.
- I-11 See responses to specific comments, below.

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I-11 cont. adequately analyze several important aspects of impacts on the community, as summarized below.

I-12 The failure of the DEIR to meaningfully analyze an unprecedented number of project inconsistencies with the County General Plan and the Harmony Grove Community Plan requires that the DEIR be rewritten and re-circulated for public review and comment.

I-13 In previous comments submitted by both the San Dieguito Planning Group, the Elfin Forest Harmony Grove Town Council and Friends of Eden Valley for Responsible Development, we have challenged the applicant's assertions that this specific plan / general plan amendment is consistent with the adopted County General Plan or with the Elfin Forest Harmony Grove Community Plan.

I-14 The proposed SP / GPA is inconsistent with the San Diego County General Plan (GP), the Harmony Grove Community Plan (HGCP), and the San Dieguito Community plan. In addition the document fails to analyze these inconsistencies and their consequences, as CEQA requires. Therefore the conclusion that overall the project would be consistent with the General Plan, therefore land use impacts associated with policy inconsistencies would be less than significant answer is incorrect. A "reasonable person" could not find this project to be consistent with either the GP or the HGCP.

I-15 The amendments to the general plan necessary to accommodate this GPA would require changing the General plan from its fundamental vision of smart growth. The general plan is very specific in terms of smart growth being defined as projects meeting stringent standards such as distances to public transportation and services. Of these standards, it requires that a project be located one quarter mile from transit, for example. This project claims to be smart growth even though it is in fact located more than one mile from the closest public transportation station and has no sidewalks allowing for safe pedestrian travel to the Nordahl sprinter station. This project is near the opposite of Smart Growth, as it is in the middle of a rural area and if allowed to proceed will represent one more example of urban sprawl which will require people to get in their cars in order to access work, school, or shopping opportunities.

I-16 In addition, smart growth stresses the retention of or enhancement of the county's rural character and preservation of environmental resources and unique communities where they exist. This project plopped in the middle of the communities of Eden Valley and Harmony Grove, which are all but ignored by the applicant, would in fact destroy and divide the rural character of the existing communities, instead of enhancing them.

I-17 One of the most important ways this project is inconsistent with the general plan is failure to comply with land use goal LU-1. This goal states that "a land use planning

I-12 Subchapter 3.1.4 of the EIR contains a detailed analysis of the Project's consistency with the General Plan and the applicable community plans. Also, please refer to Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis.

I-13 See Topical Response: General Plan Amendment and Subarea Boundary CEQA Analysis. Previously submitted comments were carefully considered by the County, and it was determined that the Project follows the guiding principles, and is consistent with the County of San Diego's General Plan.

I-14 See Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis. The Project does not require changing the policies or vision of the General Plan. Each alleged inconsistency with the General Plan, San Dieguito Community Plan, and the subarea EFHGCP is addressed individually in these responses as well as in Subchapter 3.1.4 of the EIR, supporting the overall conclusion of consistency.

I-15 The General Plan does not include a definition of smart growth, nor does it require that a project be located within 0.25 mile of transit, although it does refer to the SANDAG RTP. The Project does not claim to be a Transit Priority Project or Smart Growth Opportunity Area project as defined in the SANDAG RTP/SCS and associated documents, which would require, among other features, a location within 0.5 mile of a major transit stop or high quality transit corridor. Instead, the Project seeks to implement smart growth concepts, to the extent feasible. See Response D-1.

I-16 See Responses D-1, I-3, I-6, and I-7. The Proposed Project design respects the rural character of the adjacent community by clustering lots, thereby retaining biological and agricultural resources. The Project also promotes equestrian use through 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. Please also see Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis, regarding Neighborhood 5 in particular.

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I-17 cont.

and development doctrine that sustains the intent and integrity of the community development model and the boundaries between regional categories". Though this project is zoned as SR instead of VR, it offers densities which are actually higher than the neighboring Village project, Harmony Grove Village. As such it destroys, if not the letter, certainly the intent of the community development model, which aims to feather density from a dense center to less and less dense areas forming a buffer with the neighboring communities. In this case this project would locate 5000 square foot lots next to the largest lots within the footprint of the Harmony Grove Village which are actually several acres in size. Virtually all the surrounding parcels adjacent to the project area (including Coronado Hills, Eden Valley and Harmony Grove) in one, two, or more acres in size.

As such it destroys if not the letter certainly the intent of the Community Development Model, which aims to feather density from a dense center to less and less dense areas forming a buffer with the neighboring communities. In this case this project would locate 5,000 square foot lots next to the largest lots within the footprint of the Harmony Grove Village, some of which are actually several acres in size.

I-18

Though this project is describing itself as a "semi rural" project the densities in fact are more akin to these of a village. Policy LU - 1. 2 specifies that "for purposes of this policy, leapfrog development is defined as village densities located away from established villages or outside established water and sewer service boundaries". This project proposes village densities and is outside established sewer service boundaries.

I-19

The proposal is inconsistent with the Community Development Model. The General Plan states on page 3 - 6 that "the community development model directs the highest intensities and greatest mix of new uses to village areas while directing lower intensity uses, such as estate style residential lots and agricultural operations to semi rural areas". It is clear from this description that semi rural areas are to be used for estate style residential lots. This project proposes Village densities within a semi rural area, making a farce of the distinction between regional categories.

**A. INADEQUATE PROJECT DESCRIPTION**

**S 1.1 LOCATION:**

I-20

The project description misstates the ACTUAL distances to various points, in a thinly veiled attempt to make it appear closer than it is to existing infrastructure, and pretend to qualify for Smart Growth, a term used repeatedly in this DEIR although County Staff soundly rejected the argument during the NC17 Property Specific Request hearings at the Board of Supervisors. Instead of being located "approximately 1.7 miles west of Interstate I-15 and 0.6 mile south of State Route 78

I-17

See Responses G-6, I-3, I-4, and I-7. Of the 5 neighborhoods within the Valiano Specific Plan, only Neighborhood 5 is located within the Harmony Grove Community Plan area. Please see Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis.

I-18

The Project does not propose village density and does not constitute leapfrog development according to policy LU-1.2. See Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis, and Response G-6 for discussion of village residential densities.

I-19

See Responses G-1, G-6, I-3, I-7 and I-17. In accordance with the General Plan, the Valiano Project includes estate style residential lots, a 35.4-acre easement for agriculture, and a residential density with semi-rural intensity (with clustering to preserve resources). The Specific Plan has a proposed density of semi-rural 0.5, with common open space areas and some lots that accommodate horse keeping. While not proposed as part of the Project design or Landscape Plans (and not required to address any associated agricultural impacts), the proposed development would allow orchards and gardens on individual residential lots and appropriate HOA-maintained lots.

I-20

Using Google Maps, distances better described in driving distance have been revised in the Final EIR. Please also see Response D-1.

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I-20 cont. (SR-78) at its closest points”, actual distances as measured by driving distances are 2.7 miles and 1.4 miles respectively (Google maps attached as appendix).

I-21 To further rebuke the argument made elsewhere in the DEIR that this constitutes a Smart Growth project “walkable to public transportation”, it is worth noting that the distance to the Sprinter station from Integral’s closest ingress/egress point is:

- 1.5 miles through the business park
- 1.6 miles via Country Club and Mission
- 1.8 miles to Neighborhood 5

When talking about accessing the Sprinter by foot it is important to note that there are no sidewalks for a good portion of those trips, making them unsafe to walk to.

I-22 Similarly, the project is not “in an unincorporated portion of San Diego County within the Eden Valley portion of the San Dieguito Community Planning Area”, which conveniently for the applicant does not have an adopted Community Plan (CP) but partly contained within the Elfin Forest/ Harmony Grove (EFHG) Community Area, which has an adopted CP the applicant is choosing to ignore. Hence the impacts to the EFHG Community Plan are not sufficiently analyzed in the DEIR, which constitutes a substantial adverse environmental effect of the project for which the public is deprived of a meaningful opportunity to comment.

S1.2. DESCRIPTION:

There are a number of discrepancies and inaccuracies under this section that again render meaningful public input impossible.

I-23 While the document states that “The Proposed Project consists of a residential community with 326 single-family dwelling units (du), a resident’s/builder’s option to include Second Dwelling Units on 54 lots and related facilities (...)”, the impacts throughout the document do not refer to the maximum build out, which is 326+54 units, or 380 units, but only to a reduced number of dwelling units. As such the impacts throughout the document need to be recalculated to take into account the potential worst case impact of the proposed project. Should these 54 units be built, occupied and rented out, as they can by code, the additional potential occupants will contribute to traffic, to risk of starting fires, to evacuation traffic during emergencies, and in general to the overall impact of the Project. They represent a 17% increase over the baseline number, an increase too substantial to simply leave out of the pertinent calculations.

I-24 Likewise, the area disturbed is noted as “(...) within a total disturbance area of approximately 127 acres”, when in fact the total area disturbed including during construction is likely significantly higher than noted: according to the biology report the total impacts are 164.9 acres. These figures need to be reconciled to ensure they capture the full impact of disturbance, including fire clearing.

I-21 See Response D-1. The locations of existing sidewalks on roadways in the Project area are described in Subsection 2.8.1.1 while proposed sidewalks on the Project site are listed in Table 1-1. In addition, the Project would build a new sidewalk on Country Club Drive between the existing industrial park and Auto Parkway.

I-22 Subchapter 2.1 of the EIR correctly states that the Project site is located within the San Dieguito Community Planning Area, of which Elfin Forest and Harmony Grove are a part. Subsection 3.1.4.1 (Land Use) of the EIR acknowledges that the southern portion of the Project site is located within the Harmony Grove community and discusses the EFHGCP policies specific to that area. The EFHGCP subarea does not apply, however, to the great majority of the Project parcels. Only Neighborhood 5 is located within that Plan area (see Figure 5 of the EFHGCP, which terminates jurisdiction at Mt. Whitney Road). The majority of the Project is within the Eden Valley portion of the San Dieguito Community Planning Area. See Response I-12 and Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis.

I-23 As can be seen in Subsection 2.8.2.1 of the EIR, trips from the Accessory Dwelling Units are included in the traffic estimates. Regarding evacuations, see Topical Response: Fire/Evacuations. Regarding the risk of starting fires, see Response I-53. The Project is expected to improve safety for residents of both the Project and adjacent existing community. Please reference Response I-59.

I-24 The disturbance/impact area differs depending on the type of resource being analyzed. The total disturbance area of 127 acres (now 125 acres in the EIR due to site plan changes) represents the area to be graded for the Project, whereas the biological impact area of 159.9 acres (revised from the noted 164.9 acres in the latest Biological Technical Report [BTR]) includes additional areas where biological resources would be (potentially temporarily) impacted. The EIR has been revised in Sections S.1.2 and 1.2.1.1 to refer to the total disturbance area as the grading area. The figures capture the full impact of disturbance for the resource being analyzed.



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S 1.3 SETTING:

Again in what appears as a deliberate effort to confuse the decision makers perhaps not familiar with the area, the Project setting is described as "Nearby urban development includes high-density residential and commercial uses to the north (San Marcos) and east (Escondido)". The closest San Marcos residential area visible from the project, Coronado Hills, is actually San Marcos Land Use A1, or Agriculture with minimum of 1 acre lots, as pointed out by letter from San Marcos Planning Department expressing concern about compatibility with these size lots given a project proposing 5,000 sq ft lots. The "high density residential to the North" is neither visible nor accessible from the project side or the valley in which it sits (driving distance to the area mentioned from the closest project entrance is a full 1.5 miles, hardly a relevant neighborhood for project description purposes).

The "high density residential to the East in Escondido", again, is on the other side of a granite ridge, neither seen nor heard, and a full four driving miles from the closest project entrance. The closer Escondido project over the other side of the ridge, Hidden Hills, averages 1/2 acre lots so cannot be referred to as "high density". As such the Project Setting is misleading in a way that favors the applicant and deprives the public of a fair opportunity to comment, lest they be intimately familiar with the area falsely described.

1.4.1 Project Vicinity

It is not accurate to state that the "semi-rural area encompassing a mix of urban development, agriculture and open space. The Harmony Grove Village lots closest to the project are mostly 1/2 acre and 1 acre lots, a few are 1/3 acre, and the largest is 19 acres; they are all horse keeping lots. These do not qualify as "urban"

**B. INADEQUATE PROJECT ALTERNATIVES DESCRIPTION AND ANALYSIS**

S.5.3.1 Description - General Plan Density Alternative

Building 118 homes vs. potentially 380 on this 239 acre site cannot possibly be described as "Although this alternative would be lower in development intensity than the Proposed Project, **the same potable water and sewage lines and on-site roads (and focused off-site road improvements) would still be required. Similarly, the WTWRF and associated pump stations would be required to serve the Project site**". It is patently incorrect to state that the same potable water and sewer lines would be required, for several reasons:

- ✓ 118 dwelling units use less potable water than 380 – less showers and toilets usage, and surrounding homes are not landscaping and watering their entire yards as smaller lots plus landscape easement would. Hence potable water requirements would be substantially less, but the DEIR fails to adequately analyze this impact.

I-25 To avoid potential confusion, the EIR has been updated to include approximate driving distances from the Project to the urban development and other areas within vicinity of the Project. This change is a clarification of fact that does not require circulation of the EIR under CEQA. Regarding compatibility regarding adjacent City of San Marcos residential lots, see Response F-2.

I-26 See Response I-25. In addition, high-density residential in the City of Escondido (located off Avenida Del Diablo) would be located approximately 1.1 miles driving distance from the southern Project entrance.

I-27 The referenced section describes the surrounding area. Urban development such as the light industrial uses, mobile home communities, hospital and Escondido Technology and Research Center, and the under construction Harmony Grove Village constitute urban development within the surrounding area. The referenced section in the EIR has been updated to include examples of the urban development. This change is a clarification of fact that does not require circulation of the EIR under CEQA.

I-28 Public water and sewer systems are designed to minimum standards that may result in the same or similar infrastructure for 100 homes or 326 homes. For example, the Proposed Project's potable water distribution system is primarily sized for a residential fire flow. The water pipeline sizes required are sized based on a fire flow, which is significant higher flow than the water use for the houses. Therefore the water distribution pipelines can be the same size for a 100 residential unit project or a 326-unit residential project. Furthermore, the County requires a minimum 8-inch sewer pipe size for collection systems. Based on the hydraulic analysis and minimum slopes, the majority of the Proposed Project's sewer system would basically have the same size sewer pipelines whether it serves 100 units or 326 units.

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- I-29 ✓ The General Plan has no provision for sewer lines and those homes could be on individual septic tanks, especially with the recently approved Alternative Septic Systems, therefore it is not correct to state: *“the same sewage lines would be required”*. The DEIR fails to adequately analyze this impact.
- I-30 ✓ Less roads and general disturbances would be required to accommodate a third of the housing stock proposed, hence the statement *“the same on-site roads (and focused off-site road improvements) would still be required”* is incorrect. The DEIR fails to adequately analyze this impact.
- I-31 ✓ As stated above, 118 homes built to the current GP would not require a WTRWF: they would use the same waste treatment system as the homes currently surrounding the proposed project, both in the Unincorporated communities of Eden Valley and Harmony Grove, and the closest homes in the City of San Marcos: they would use individual septic systems. With the Board of Supervisors approval of the Alternative Septic System On June 10, 2015, this alternative needs to be re-analyzed under the new regulatory framework.

Further, the analysis provided misstates the difference in impact of building to the GP vs. the Proposed Project in ways that are misleading to the public and the decision makers. Examples includes:

- I-32 ✓ *“the identified impacts would be greater than that identified for the Proposed Project based on the provision of less dedicated open space under this alternative”*: much of the so-called “open space” in the Proposed Project is actually backyard open space, with limited to non-existent biological value, there are no provisions for the minimum of 1,000 feet of connected O/S for wildlife corridors in the Proposed Project, and the Agriculture open space would remain since it consists primarily of a granite mountain with 20 to 25% slope where the 118 units would certainly not be located.
- I-33 ✓ *“earthwork would not be balanced on site and would require import of substantial amounts of soil.”* The building of the vast majority of the existing estate residential homes surrounding the project did not require “import of substantial amounts of soil”, and there is no reason to posit that more homes built to the same estate residential standards would require more soil import.
- I-34 ✓ The analysis of this alternative contradicts itself in that it states on the one hand *“The General Plan Density Alternative would meet Project objectives related to complementing and responding to the unique topography and character of the Project site and surrounding area, and embracing and preserving the equestrian nature of the surrounding area”* yet ends the same paragraph stating: *“This alternative would not meet Project objectives related to (...) providing amenities for the equestrian community.”* The surrounding equestrian community has neither asked for nor needs any “amenities” beyond those existing in the community as it exists today. The fact the applicant has chosen to add this objective to its list of Project Objectives is a self-serving but empty gesture to the existing community, which this DEIR elsewhere states “does not exist”.

I-29 The General Plan Density Alternative was developed based on the ability to achieve the unit count that can be built under the General Plan density and zoning. To achieve the GP Density, it was determined that the alternative would require sewer. In addition, the Septic Alternative was updated in the EIR to include an alternative septic system based on the LAMP and related amendments to the San Diego County Code of Regulatory Ordinances (Division 8 of Title 6) which were issued after the NOP for the EIR was issued. Based on site constraint, approximately 66 dwelling units could be constructed with this type of septic system which is considerable fewer than the 118 allowed under the General Plan Alternative.

I-30 While there are fewer homes under this alternative, larger lots spread of over the entire site would still require an extensive road system and similar infrastructure (e.g., potable water and sewage lines). The quoted statement has been clarified in the EIR.

I-31 See Response I-29.

I-32 The Project would include 31.2 acres of biological open space; backyard open space is not included within that acreage.

The General Plan Density Alternative analysis determined that impacts would be greater than identified for the Project based on the provision of less dedicated open space under this alternative: The General Plan Density Alternative would require compliance with the RPO and dedication of open space in areas where there are wetlands and steep slopes, but it would only provide 15 acres of biological open space due to larger lot sizes when compared to the clustered design of the Proposed Project.

The MSCP planning standards do not apply for this area because it is not in the proposed Pre-Approved Mitigation Area (PAMA). The Project would not alter existing wildlife access from the west to two riparian areas on site, one in preserved lands in the northernmost parcel within southern mixed chaparral and avocado groves, and the other within biological open space in Neighborhood 4. These areas are part of a 47.5-acre block of land that consists of biological open space and an agricultural easement, which connect to off site native habitat along approximately 2,900 linear feet of the western site boundary. In addition to providing opportunities for wildlife movement between the site and areas to the west, these riparian areas and adjacent preserved lands would continue to provide areas suitable for foraging and breeding, as well as providing a water source for wildlife. As the site is situated at the western edge of existing residential development, connectivity for wildlife to areas to the north, east, and south of the site is already limited; therefore, there is no wildlife corridor that extends across the site to off-site conserved lands to the north, east, or south.

COMMENTS

RESPONSES

- |               |   |
|---------------|---|
| I-32<br>cont. | <p>Regarding the agricultural open space, this easement area would encompass up to eight residential sites similar to those existing in the Coronado Hills. Associated grading and roadway development is depicted on EIR Figure 4-1. It should also be noted, however, that the discussion of potential agricultural impacts under the General Plan Density Alternative has been modified to state that the individual residential lots under this design would include opportunities for the continuation of agricultural resources (e.g., in portions of Proposed Project Neighborhoods 2, 3 and 5). As a result, associated impacts to on-site agricultural resources would likely be reduced compared to the Proposed Project.</p> |
| I-33          | <p>While it is acknowledged that there are many ways to design the site based on the current General Plan, the site plan presented for this alternative does require significant import of material. This is due to the constraints imposed on the site by the steep topography and shallow bedrock, which without the benefit of clustering utilized by the Proposed Project makes the site more conducive to the placement of fill than to the cutting of additional material to create a balanced site.</p>  |
| I-34          | <p>The EIR has been revised (Sections S.5.3.1 and 4.3.1) to remove the statement that the alternative would not meet Project objectives related to providing amenities for the equestrian community, as the General Plan Density Alternative would likely be required to have similar features such as a public multi-use trail, staging area, and public parks.</p>  |

COMMENTS

RESPONSES

S.5.4.1 Description - Septic Option Alternative

This alternative description is neither accurate nor fairly describes what a true septic option alternative would be. Since size of leach field is directly related to number of bedrooms, to use only 5 bedrooms homes for this alternative is disingenuous at best. This alternative should analyze a range of 3BR, 4BR and 5BR d.u.s, similar to the surrounding estate residential homes, and certainly not assume that 5 acres is the minimum lot size, give that surrounding homes both in the county and in the San Marcos community of Coronado Hills operate on septic on lots as small as ½ acre, and most have only one or two acres, not five and more. As such this alternative needs to be re-analyzed with more realistic homes and lot sizes numbers, as opposed to inflated numbers that completely obfuscate the actual difference in environmental impacts, hence depriving the public of a meaningful opportunity to comment on a feasible way to mitigate or avoid a substantial adverse environmental effect of the project.

In this case, the DEIR does state that *“this option would avoid or reduce most significant impacts associated with the Proposed Project, including: (1) “significant and unmitigated aesthetics and air quality impacts; and (2) significant and/or potentially significant impacts related to biological resources, cultural resources, noise, paleontological resources, transportation/traffic, hazards and hazardous materials, public services (fire protection) and geology and soils, all of which would be avoided or reduced to less than significant through identified mitigation measures and/or design features.”* But it goes on to state that such an alternative would *“fail to meet all of the Proposed Project objectives”*. Those project objectives are chosen by the applicant to ensure none of the alternatives will meet them all, except the Proposed project. In this case, the DEIR needs to be re-circulated to analyze a more realistic septic only alternative, with the following criteria:

- ✓ Range of bedroom sizes
- ✓ Range of lot sizes
- ✓ Implementing alternative sewer systems as well as conventional
- ✓ Minimal grading and land form modification
- ✓ Similar in look and feel to the surrounding estate residential homes in both County and San Marcos, because those are the homes that are within the community view shed.
- ✓ Biological open space contained within a separate lot as opposed to “backyard open space” whose functionality can more easily be compromised.
- ✓ Redesigned with 2-acre minimum lots on the portion of the site that has prime soils, to reduce agricultural impacts.
- ✓ Incorporating a dedicated agricultural easement over the portion of those lots that remains usable for agriculture, which would be counted as mitigation and potentially eliminate the need to purchase off-site mitigation.

An alternative septic only project with these criteria would likely meet some of the Project Objectives, such as providing a range of home sizes.

I-35 For planning purposes, the Project’s sewer septic studies utilize the worst-case sewer flow scenario by using the highest number of bedrooms for calculating potential impacts. Also note that the General Plan policies that require a range of lot sizes and home sizes (LU-3.2, H-1.7, H-1.8) only apply to larger subdivisions, so there would be no County policy requiring a variety of house or lot sizes for a project built at the existing General Plan density. See Response I-29.

I-36 See Response I-29. The CEQA standard for selection of an alternative is that it feasibly attains most of the basic objectives of the Project but avoids or substantially lessens any of the significant effects of the Project previously analyzed (CEQA Section 15126.6). Recirculation of the commenters’ alternative septic alternative would not be necessary, unless it was a feasible Project alternative, was considerably different from others, and would substantially lessen significant impacts. In this case, the suggested alternative is considered speculative, would offer a density between the Septic Option and the General Plan Density alternatives, and would not substantially lessen impacts.

I-37 See Responses I-29 and I-35.

I-38 See Response I-29.

I-39 The Septic Option Alternative presented in the EIR would have substantially less grading and construction activities than the Proposed Project. It was determined that related environmental impacts (air quality, cultural resources, paleontological resources, noise, and geology and soils) would be reduced due to less grading and landform modification.

I-40 The Septic Option Alternative presented in the EIR would avoid significant impacts to aesthetics that would occur under the Proposed Project. The alternative discussed would have a similar look and feel to the surrounding estate homes, as the Project site would continue to appear as a primarily undeveloped area and aesthetic impacts related to retaining walls and manufactured slopes would not occur.

I-41 Although biological open space was not put into a separate lot in the analysis, the Septic Option Alternative would still reduce the significant impacts to biological resources as compared to the Proposed Project

COMMENTS

RESPONSES

- I-41 cont. since biological and steep slope easements would be placed over 185 acres, as compared to fewer than 40 acres of biological and steep slope easements on the Proposed Project.
- I-42 As depicted on EIR Figures 2.3-3a/b, 4-1, and 4-7, the General Plan Density and Septic Option alternatives evaluated in the EIR include minimum 2-acre lots in the on-site areas with CDC Prime or Statewide Important candidate soils. Accordingly, as outlined in Sections 4.3.2 and 4.7.2 of the EIR, these alternatives would likely result in fewer direct impacts to agricultural resources than the Proposed Project (with the associated Final EIR text modified to clarify this point, see Response No. I-32 for additional discussion of modifications to the General Plan Density Alternative in the Final EIR). As concluded in the EIR alternatives analysis, however, neither noted alternative meet all of the stated Proposed Project objectives.
- I-43 As indicated in Response I-42 above, applicable portions of the site under the General Plan Density and Septic Option alternatives include minimum 2-acre lots in areas with Prime or Statewide Important candidate soils. Accordingly, a number of lots under these alternatives may potentially be subject to the placement of LBZ easements to provide on-site mitigation for Project-related agricultural impacts, rather than (or in combination with) the use of off-site mitigation as identified for the Proposed Project (see Response No. I-32 for additional information). It should also be stated, however, that both of the described on- and off-site mitigation options are allowable under the County Agricultural Guidelines, and either mitigation option would reduce associated impacts to a less than significant level.
- I-44 See Response G-3.

**Proposed Alternative Project to be analyzed in re-circulated DEIR**

I-45 A “septic-system-mostly” hybrid design with varied home sizes featuring predominantly 3- and 4- bedroom homes with some 2- and 5- bedroom homes on varying lot sizes from 3/4 to 2 or more acres. Newly approved advanced treatment septic system units should be used as required to reach GP allowed density. There should be no more than 23 homes on individual septic systems only in neighborhood 5 per the Harmony Grove adopted Community plan, and no more than 95 homes on the remaining neighborhoods throughout the 239 acres using this design (per GP densities).

I-46 All project homes should allow horse keeping, like the surrounding community, and a public trail system would connect all homes to the larger regional trails. Little community landscaping is necessary. No additional community amenities are necessary, but if provided, there should be provision to share, on a paid basis, with the existing residents. There should be no community-wide gates or walls, and the portion of the development in Harmony Grove should be associated with the name “Harmony Grove” and the portion in Eden Valley should be associated with the name “Eden Valley”.

**C. HAZARDS – WILDLAND FIRE RISKS ARE SEVERELY UNDERESTIMATED**

I-47 Our greatest concern with this project is the added density proposed in its location given the risk to life and safety from wildfires in the area. In the Coco’s fire in 2014, which burned over 90% of the project footprint, and is not analyzed in the FPP for this project, current residents of Eden Valley and Harmony Grove had difficulties evacuating because of congested road conditions. There is only one narrow two lane road (Country Club Drive) to exit the community, and with only the 80 or so residents of Eden Valley and perhaps another hundred from Harmony Grove, the roads were blocked by horse trailers and traffic, making the exit towards Hwy 78 very difficult as traffic was backed up on Auto Parkway and on Country Club Drive trying to turn onto Auto Parkway. To the West evacuating traffic taking Harmony Grove Road to Elfin Forest Road found itself ensnared in a traffic jam at the corner of Elfin Forest Road and Twin Oaks/San Elijo, with delays of over an hour to try to reach Rancho Santa Fe Road. (see Union Tribune coverage at <http://www.utsandiego.com/news/2014/jun/07/san-elijo-traffic-review-cocos-fire-san-marcos/> and as appendix)) To the East traffic was congested for about an hour along Country Club Drive at Auto Parkway, and along Harmony Grove Road at Kauana Loa.

I-48 The project as described does not improve the infrastructure to evacuate but simply adds up to 380 dwelling unit traffic on the same 2-lane road which has been shown to be inadequate before even one Valiano resident moved in.

I-45 See Response I-29.

I-46 See Response I-7. Neighborhoods 3 and 5 include some lots of appropriate sizes to allow for animal enclosures. For Neighborhood 5, this is consistent with EFHGCP Policy LU-1.5.3. EFHGCP Policy LU-1.9.2 encourages the keeping of equestrian and market animals but is not a requirement. Valiano includes a public equestrian and pedestrian trail system throughout the development. Walls within the EFHGCP area are limited to the northeast and northwest portion of Neighborhood 5 and are noise walls or walls for enhanced fire protection only. Per Section 2.1.5 of the Valiano Specific Plan, walls shall be an extension of colors and materials of adjacent architecture and shall recede into the landscape rather than become a dominant visual feature. Therefore the walls are in compliance with Policy N-1.3 of the County’s General Plan. The Valiano Project area is not a gated community; the exception is the emergency access gate on Hill Valley Drive on the northeast. If the right of way or easement becomes available for use or purchase for Hill Valley Drive; it would then be used as a day-to-day access and not only for emergency purposes and there would be no gate. The name of the Project is not a CEQA issue.

I-47 See Topical Response: Fire/Evacuations. The Project is located within very high to moderate Fuel Hazard Severity Zone and the existing and planned roads provide adequate multi-directional emergency evacuation routes. The Project is located in an area that lends itself to specific access points, which permit travel over emergency evacuation routes leading to the north, west, south and east (see FPP Figure 1, Evacuation Routes Map). A recent positive effect on traffic during an emergency evacuation is the opening of Harmony Grove Village Parkway. This road now connects from Country Club Drive to Citracado Parkway, ultimately connecting drivers to Valley Parkway and I-15. The road has been constructed to accommodate traffic from Country Club Drive to Harmony Grove Road via one travel lane in each direction with a center turn lane, essentially providing a second eastbound lane in case of emergency. From Harmony Grove Road to Citracado Parkway, the road has been constructed to accommodate and enhance traffic movement by providing one travel lane in each direction with a 4-foot striped median.

COMMENTS

RESPONSES

I-47  
cont.

Although there is not a commitment at this point in time, the planned improvements and completion of Citracado Parkway and the completion of the Auto Parkway/Country Club Intersection improvement will significantly improve evacuations in the area.

All routes identified for evacuation and alternate traffic control are subject to actual live conditions during a wildfire in the area and are subject to override and on-the-ground assessments of the conditions and safety measures at the time of an emergency. Delays are inherent in the state of emergency and the safety personnel have taken such delays into account when the evacuation notices are delivered to specific areas and residents within each area.

The Sheriff's Department, a member of Incident Command, is responsible for evacuation when a fire incident in the area occurs. In recent years, especially after the 2003 and 2007 fires, emergency communication and implementation of evacuations has greatly improved and become much more efficient in providing evacuation information and notifications for evacuations (e.g., the reverse 911 system, and the information and assistance provided by the AlertSanDiego and ReadySanDiego programs).

Fire evacuations are further discussed in Topical Response: Fire/ Evacuations.

I-48

See Topical Response: Fire/Evacuations regarding evacuations. In addition, the Project would improve the infrastructure of the area through off-site road improvements in multiple locations including Hill Valley Drive, Eden Valley Lane, Mount Whitney Road, Country Club Drive, and Kauana Loa Drive; these improvements are described in detail in Subsection 1.2.1.2.

COMMENTS

RESPONSES

I-49 The DEIR does identify some the impacts specific and peculiar to this project: asking neighboring property owners to host and bear the burden for the Fuel Modification Zone for the Project on their own property (sic!), and building structures for occupancy in an area beyond the 5 minute response time mandated by County code from its jurisdictional fire service (SMFD).

I-50 2.9.2.6 Potential conflicts with the FPP could occur, as follows: a) Certain areas offsite (APNs 232-491-01, 232-491-42, and 232-492-02) will require ongoing fuel modification and these areas may not be within control of the Applicant; b) Certain Project areas (for occupation of structures in Neighborhoods 2, 4 and portions of Neighborhood 3 as shown on Figure 7 of the approved FPP) do not currently have fire service meeting the County's required 5-minute travel time

I-51 Specific issues with HZ 3-a and 3-b as described include:  
 a) The APNs mentioned above are not the only ones affected by the FMZ spilling out of the project envelope, they are just the largest – the FMZ maps shows upwards of 21 affected parcels, and as such the DEIR needs to properly identify them all in order for the public to get a full picture of the burden the project would impose on existing property owners.  
 b) None of the owners of the APNs mentioned have been notified by the applicant or the county that their property would be encumbered by an FMZ easement in their favor, and the project cannot move forward without that agreement being secured; this is reminiscent of the situation during the General Plan Update process when this applicant presented project maps to the Board of Supervisors showing several properties as part of their project without bothering to notify or ask the property owners affected.  
 c) The very notion of imposing an FMZ on someone else’s private property may well represent a taking by the County for the benefit of a private entity, which exposes County taxpayers to legal liability.  
 d) The project should be redesigned to include the entire 150’ FMZ within the project footprint, for the safety of both current and future residents.

I-52 The project should be required to create another ingress and egress to safety via La Moree Road in San Marcos, for which we believe an easement exists from the onsite avocado orchard . That would be the only meaningful mitigation the applicant could offer to offset the documented increased risk they will place the existing community at on page 13 of the FPP :“ 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.”

FIRE PROTECTION PLAN

I-53 The Fire Protection Plan (Appendix L dated April 2015) does not analyze or include the Coco’s fire in its historical analysis. We believe this is a major flaw and that given the seriousness of the impact of that fire on the proposed project location,

I-49 Section 4.7 has been added to the FPP to provide enhanced mitigation and thereby not require easements from adjacent properties to meet fuel modification requirements. Subsection 2.9.2.6 of the EIR has also been revised.

The SMFD and the County have clarified that by using the new fire station at Harmony Grove Village, the Project would meet the five-minute travel time for emergency services.

I-50 See Response I-49 regarding off-site fuel modification.

I-51 See Response I-49 regarding off-site fuel modification.

I-52 See Responses I-47 and I-63 regarding fire evacuation and the infeasibility of connecting to La Moree Road.

I-53 Section 1.4.4 of the FPP –Fire History clarifies that the 2014 Cocos Fire was included as one of the recent fires that have occurred in this area. This section of the FPP documents the occurrence of large local wild fires. The lessons learned and evaluation of these fires were important for establishing the FPP requirements for the Proposed Project.



COMMENTS

RESPONSES

I-53 cont. which 90% burned down, and surrounding immediate area (with two houses burned on Mt. Whitney in their entirety, and 3 other structures as well as cars and heavy equipment incinerated in the immediate vicinity of the project, plus another 35 structures destroyed elsewhere in Harmony Grove), a full analysis of weather and fire fighting conditions for that specific fire needs to be included in order for decision makers to fully appreciate the potential impact of adding density in a valley prone to devastating fires.

I-54 In addition, the major fire in EF required mandatory evacuation of Harmony Grove residents in 2007, and there were two other small fires in the last 5 years on or immediately adjacent to the project site that required deployment of air tankers and fire crew support and evacuation of nearby Harmony Grove residents. EFHG Fire department and/or Cal fire were first responders and would have dates. Local residents report having evacuated, including horses, a total of 4 times in the last 7 years, underscoring the necessity of clear evacuation routes for this fire-prone community. Yet none of these local fires were reported in the analysis, which therefore does not fully disclose the potential project impacts by omitting such relevant data.

Other shortcomings of and inaccuracies in the FPP include:

I-55 1. Travel times discussed in response time also do not they do not acknowledge the Sprinter crossings that the San Marcos Fire Department *must* cross (either the Barham Road crossing or the Nordahl road crossing) to reach the project site in their calculation of emergency response times.

I-56 2. The project uses adjacent private properties as part of their FMZ, requiring 3 property owners to agree to easements to reduce fuel, while the FMZ extends to many more private properties. These adjacent properties allow horse keeping and the FMZ restrictions on possible locations of animal facilities should be studied and mitigated.

I-57 3. "Fire History" on page 12 makes a brief note of Cocos Fire but does not analyze how it burned nearly the entire project footprint, and what was learned from the fire about fire behavior in the valley. The Figures 3 and 4 only mention 2003 and 2007 fires, omitting the most recent onsite. These should include all fires that required evacuation of residents, which local residents indicate there are two more, one of which included the loss of a small outbuilding.

I-58 4. Even if a fire does not burn on the project site, several nearby brush fires have required evacuation in Harmony Grove, so the impact of fire on residents should not be calculated solely on the number of fires that burned

I-54 See Response I-53 regarding documentation of local fires.

I-55 The calculations of travel times were based on NFPA 1142, Standard on Water Supplies for Suburban and Rural Fire Fighting; 2007 Edition Table C.11 (b). The model does factor in this kind of variable for determining an approximate travel time for fire apparatus. Section 4.1 of the FPP has been revised to address this comment.

I-56 See Response I-49 regarding off-site fuel management.

I-57 See Response I-53 regarding analysis of the Cocos Fire.

I-58 See Topical Response: Fire/Evacuations regarding fire evacuations. The FPP and fire modeling considered the possibility of other fires in the area and not just on the Project site. See FPP Section 3.0 for more information.

COMMENTS

RESPONSES

I-58 cont.	the project site.
I-59	5. The Cumulative Impact Analysis fails to mention not only the 2014 fires, but the other fires in last 10 years which have required residents to evacuate.
	<b>D. TRAFFIC IMPACTS CANNOT BE MITIGATED SIMPLY WITH TIFs</b>
I-60	The Traffic Impact analysis is deficient in at least the following areas, and needs to be re-circulated once these additional and significant impacts have been measured and analyzed – please also take note of the letter submitted on our behalf by Darnell & Associates and sent with Johnson & Sedlack letter:
I-61	<ul style="list-style-type: none"> <li>Country Club Drive analysis does not discuss back-up at Auto Parkway at rush hour. This is especially acute when the Sprinter runs – forecast to double track (every 15 minutes instead of every 30 minutes) in the future. NCTD indicated the frequency of trains will increase before the double tracking occurs. So trains will be arriving every 15 minutes instead of the current 30 minutes, but this will occur without double tracking at that station. Once the double tracking does occur, the frequency may increase even more. The lack of analysis of this major impact is a serious deficiency of the TIA and needs to be analyzed and re-circulated so the public and decision makers have a more accurate picture of the true impacts of adding more drivers to an already severely impacted area.</li> </ul>
I-62	<ul style="list-style-type: none"> <li>Of most concern, no discussion of emergency evacuation given all egress is on Country Club Dr, 2 lane road, and over 50% of existing 80 residences have horses and large animals to evacuate, hence trailers and emergency vehicles impair evacuating traffic. It is particularly difficult to back up or maneuver large trailers and thus these tow vehicle/trailer combinations can quickly clog escape routes and create very dangerous conditions during evacuations where exits are blocked by congestion.</li> </ul>
I-63	The following mitigation measure should be added to relieve the impacts of added traffic, especially in case of emergency evacuation: require applicant to study completing a road through to La Moree Road in San Marcos to relieve traffic on Country Club. The developer stated to the community that the City of San Marcos opposed an earlier version of project, which had that road as an egress point. Nevertheless given the project could create a death trap for evacuating traffic, and the fact it is dumping traffic on an LOS F road, this mitigation measure should be made part of the project description and fully evaluated.
I-64	<b>E. LAND USE – INCONSISTENCY WITH COMMUNITY PLAN</b>

I-59	The FPP documents that devastating wildfires do occur and have occurred in this area and throughout southern California. The purpose of the FPP Cumulative Impact Analysis is to document how the proposed development and other proposed developments in the surrounding area can contribute to the risk and impact of wildfires, e.g., increased number of structures/dwellings and people and access for fire apparatus and personnel. This FPP establishes and ensures compliance with local and County fire codes and that enhanced mitigation measures are implemented to ensure that wildfires do not create fire safety and welfare concerns for the residents. The fire protection measures defined by the FPP for the Project would significantly improve the safety of the Valiano residents as well as substantially improve the protection of the surrounding neighborhoods in all directions from the Project boundaries. By replacing very combustible native vegetation with ignition-resistant landscaping, ignition-resistant building construction features, fire hydrants, access roads for fire safety personnel to combat any fire potential and fuel modification zones, the development of this community to an area that once contained 100 percent combustible native vegetation would add protection to all the residents of the area and provide additional time to complete a safe and orderly evacuation of the area.
I-60	See below for responses to your specific comments. The letters referenced have been noted, comments have been responded to, and the comments and responses are included as part of the public record.
I-61	<p>An analysis of the Country Club Drive / Auto Park Way intersection during peak AM and PM commuter periods is included in the Project TIA (Table 9-1 of Appendix H of the EIR). The Project is calculated to contribute to a significant cumulative impact at the Country Club Drive/ Auto Park Way intersection. The mitigation for a cumulative impact is typically the contribution of a fair share dollar amount to a future improvement or to physically mitigate for the project’s impact. The TIA recommends a physical improvement which would provide two left-turn lanes on Country Club Drive at the intersection with Auto Park Way.</p> <p>LLG reviewed the intersection in the field to ascertain the current headways, cycle lengths, and intersection operations. The SPRINTER headways are currently 30 minutes on weekdays between 4:06 AM and 9:21 PM. The current headways mean the SPRINTER services affect the intersection operations every 15 minutes or four times every hour (two trains eastbound and two trains westbound per hour). A 30 minute headway in each direction means that a train will pass by twice an hour in each direction, a total of four times per hour. This equates to a train every 15 minutes. There are 36 signal cycles during a typical hour at the Nordahl Road / Auto Park Way / Mission Road intersection based</p>

I-61  
cont.

on the average peak hour cycle length of 100 seconds. Therefore, the SPRINTER only affects the signal operations in 4 of the 36 cycles during a typical hour (four times per hour). This SPRINTER effect frequency represents 11 percent of the signal cycles for which LLG determined a separate analysis assuming the SPRINTER is present was not warranted.

According to the adopted 2050 SANDAG Regional Transportation Plan and Draft San Diego Forward: The Regional Plan, increases in frequency to 20 minutes at the Nordahl Road station are not planned until Year 2025, and double stacking of the tracks is not planned until Year 2035. Even with these planned improvements, there is currently no funding identified to ensure the timely implementation of these increases in service frequency. Additionally, the North County Transit District website currently makes no mention of any improvements/increases in frequency to the SPRINTER line. With SPRINTER frequencies increased to 20 minutes, 6 of the 36 signal cycles will be affected by the future SPRINTER operations. This future SPRINTER effect frequency represents 12 percent of the signal cycles for which LLG determined that a separate analysis assuming the SPRINTER is present was not warranted.

Based on past analyses conducted by LLG for projects located within close proximity to the San Diego trolley, the presence of the SPRINTER adds about seven seconds of delay to the average intersection delay (averaged out over one-hour period). An excerpt of a study completed for the South Santa Fe Reconstruction Project in the County of San Diego where the effects of the new-at-the-time SPRINTER line were evaluated can be found in Appendix F of the TIA. LLG had collected data regarding the frequency of San Diego trolley headways and the average time of gate closure for passing trolleys was recorded at three stations. As a result of that study, the weighted average delay per cycle was calculated at seven seconds. The seven seconds of increase in delay is not enough to change the results of the analysis. In addition, it should be noted that significant cumulative impacts are already calculated at both the Auto Park Way intersection at Country Club Drive and Mission Road. No additional impacts would be calculated. This information has also been included in the EIR Traffic Study.

It should be noted that it is not the standard of practice to add SPRINTER-induced intersection delay to an intersection analysis. In addition, the North County Transit District (NCTD) did not comment on the need for SPRINTER analysis. It should also be noted that the reason increased frequency is planned is to increase ridership. Increased ridership decreases the number of vehicles on the road which would be a net benefit to intersection operations. It should also be noted that while intersection delay would increase with increased frequency, the Project traffic increase, which determines the significance of an impact does not change whether the headways are 15 minutes or 30 minutes.

COMMENTS

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- I-62 The specific needs of animals during evacuation events are understood by emergency responders as a result of experience obtained from prior fire events. This experience has increased the region's ability to mobilize and provide resources needed to evacuate large animals such as horses. In the event of a wildfire, the residents are key for providing evacuation means for their animals, but would be assisted with emergency resources normally available to large animal owners in times of emergency (such as local equestrian groups, Humane Society animal evacuation shelters, and the County Operation Emergency Services [OES] which staffs the Unified Disaster Council [UDC], a joint powers agreement between all 18 incorporated cities and the County of San Diego; the UDC provides coordination of plans and programs countywide to ensure protection of life and property). Evacuations are further discussed in Topical Response: Fire/Evacuations.
- I-63 An evaluation of the connection to La Moree Road was conducted early on in the Project's planning cycle and, as neighborhood feedback for lower density was expressed, the Project dropped the density associated with this parcel and determined the parcels would be Agricultural Open Space. The physical constraints (absent large lot grading operations) of building this road would also be substantial and would include blasting of rock and using large retaining walls.

The DEIR fails to analyze the impacts on community character.

EIR section 1.6: The Valiano project is inconsistent with the Harmony Grove Community Plan **Policy LU-2.2.1**.

**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.*

Although the project's density falls into the semi-rural category, and the project emphasizes semi-rural elements and themes, the project design features clustered, suburban homes with the majority allowing no horse keeping. Because the associated **Issue LU-2.2.1** specifically calls out an "urban, clustered, or suburban design" as the types of residence this policy is directed toward, and further specifies that this clustered design "threatens the continued existence of the rural residential and equestrian character of Elfin Forest / Harmony Grove," the project's contributions to the urban /rural balance must be calculated and any impacts identified and mitigated.

Calculations:

Per GP - there are various factors to consider, and various ways to calculate:

- Existing residences only or entitlements per current GP?
  - HG has 125 existing residences according to EFF Fire department, Eden Valley has 80, so about 205 existing residences,
  - If we add GP current entitlements for large parcels, Valiano adds 118, so about 320, and Kovach still as SR regional category after the upzone received during the GP Update (from 26 to 210), so we can count it as "rural" at 210 on 110 acres, for a total of 533 rural residences.
- What is the deciding factor to classify a given property as "rural" vs. "urban"?
  - The county proposes to use the SR category as the definition of "rural" even if clustered on tiny lot (see planner comment below). By that count Harmony Grove Village has 742 homes within the Village Limit Line zoned as VR, therefore we would have 205/742 at current build or 533/742 at build out.
  - Or we would argue size of lot and/or whether it is zoned equestrian is a better measure of a truly "rural" vs. "urban" property. To count the condos in Valiano as rural because they are in an SPA zoned SR is plain silly, just as 55 of the HGV lots at the village periphery are zoned equestrian with lot sizes up to several acres, so we can argue these are more rural in nature -
- So, at a minimum, there are 533 existing rural lots in HG/EV and 742 urban going by SR vs. VR designation, or **58% urban, 42% rural**, or 588 rural if we incorporate the 55 HGV equestrian lots vs. 687 urban or **54% urban, 46%**

I-64 See Responses I-3 and I-7 as well as Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis.

I-65 See Responses G-6 and I-7.

COMMENTS

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**rural; urban residences do not greatly exceed rural residences - a carefully crafted compromise**

With Valiano

Adding 318 urban residences and subtracting 118 from rural= **1,005 urban and 400 rural or 72% urban vs. 28% rural; urban residences outnumber rural residences two to one**

**EIR 2.2.2 Community Recreation Areas** The on-site public multi-use trail system should include linkages to the proposed public multiuse trail in Harmony Grove that would connect the HG Village trails with residents to the northeast and through the SDG&E property immediately east of neighborhood 5 to the ERTC trail (leading to business park and hospital). It is listed on the County Master trails Plan. The only way currently to make this connection would be to use the narrow, 5-foot wide DG pathway trail that is adjacent to County Club Drive and is unsuitable for the expected volume of trail users anticipated to use this important commuter trail.

Effects of Land Use Incompatibility Not Analyzed

The EIR fails to consider and analyze the incompatibility of suburban housing densities with equestrian facilities. With over 160 horses currently living in Eden Valley today, the project will be foisting significantly smaller lots than the current larger parcels into an area that was specifically intended to accommodate horsekeeping. Despite lip service in the Valiano plan, there will not likely be horsekeeping on these relatively small parcels. No true equestrian would humanely keep a horse on 1/3 acre. Not only was the San Dieguito Community Plan revised to protect and celebrate the semi-rural setting that is perfect for equestrian businesses as well as individual horse owners, but the County passed an Equestrian Ordinance to promote the continuance of equestrian activities in places just like Eden Valley, and has an extensive trails system suitable for riding in the immediate vicinity.

In short, the County has done everything in its power to help maintain this traditional and important sector of the economy. Indeed, world champion competition horses come out of Eden Valley, with associated support businesses benefitting. All of that is threatened by the Valiano project, and no analysis was done in the DEIR to examine what the effects of a suburban-density project would have on this community. Horsekeeping entails some effects that the general public, especially residents living next door to horse ranches, might find annoying. These include noise from horses themselves, noise from horse events & shows, dust, flies, manure odor and disposal, and most serious, possible conflicts between riders and automobiles. Horses spook easily, and many more cars coming and going will lead to potentially serious accidents. Eventually, due to greater numbers, the suburban homeowners can effectively drive the equestrians out of business.

I-66 In addition to the 5-foot soft surface trail on Country Club Drive, Figure 3-11 of the Specific Plan shows three 10-foot wide soft surface trails connecting Neighborhood 5 to the Harmony Grove Village Project. Final public park design, including driveway and trail locations, will be determined in consultation with County Department of Parks and Recreation (DPR).

I-67 See Response I-46. The County Zoning Ordinance does not set a minimum lot size to allow horse keeping. Based on the setbacks in the Valiano Specific Plan, there is adequate space on a 1/3 acre lot for horse keeping, as shown on EIR Figure 1-9. In addition, the EFHGCP specifically allows livestock on 1/3 acre lots in Policy LU-2.2.2. Please see Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis for discussion. The decision whether to keep horses would be made by the future homeowners, who may also become customers for existing equestrian businesses. The proposed multi-use trails would expand riding opportunities in the neighborhood.

I-68 The Project contains horse-friendly elements that contribute to an equestrian-friendly environment that would not threaten current equestrian-related activity and businesses. Portions of the existing equestrian facility in the southeast corner of the Project would be retained as an equestrian staging area (the site would be reconfigured to allow public horse trailer parking and use of an exercise ring). It would be maintained privately, yet open to the public. The Project also would promote equestrian use through the provision of an equestrian trail head area and multi-use trail network. Neighborhoods 3 and 5 would provide lots that would accommodate horses within the County's animal keeping guidelines. In addition, the proposed multi-use trails and pathways would reduce, rather than increase, conflicts between horses and cars.

**G. AGRICULTURE IMPACTS ARE NOT EVALUATED PROPERLY**

The DEIR fails to properly mitigate the impact of the project on viable agriculture. The applicant proposes to take 36 acres of productive agriculture, previously farmed by a bona fide farmer and turn it over to a suburban HOA to "manage" a "farm manager".

The impact of this mitigation measure would be the following:

- since the "farm manager" would likely be paid much like a landscaper, and the farm under HOA management would actually be subsidized hereby manufacturing unfair competition for bona fide farmers making a living out of farming selling the same crops.
- taking these 16 acres out of the farming market by subsidizing both the operator and through an endowment prevents a bona fide farmer to have a chance to expand or start their operations on land that is increasingly expensive or off limits due to environmental constraints defeating the purpose of agricultural mitigation and the County PACE program.
- Farm acreage managed by an HOA, which has no expertise or experience in agricultural operations, is a recipe for disaster as far as continuing productive agriculture onsite. The HOA's concerns are likely to have more to do with cost, impact of chemicals used in agricultural production on nearby residences, and aesthetics than anything to do with running a viable farm operation. As such chances are that after the 10 year endowment runs out, onsite agriculture would be abandoned and it would likely never be available to farm which was the point of the mitigation.
- Instead the DEIR should make provisions for the land to be leased to a farmer with either at least 15 years of experience, or a college degree in ag and 2 years experience.
- Even better would be the 36.5 acres in agriculture just to be made available with the County agriculture easement in place, the lower entry cost of pure agriculture land would most certainly result in a viable agriculture operation even if it may take a few tries.
- The alternative project with 2 acre lots and agricultural easements should be fully evaluated and analyzed as it is likely to have considerably less impacts on the loss of agricultural resources.

Because of the numerous shortcoming of this DEIR, we respectfully ask that it be re-circulated with the project alternative suggested, and the missing analysis for impacts noted in this document as well as in letters submitted on our behalf by Johnson & Sedlack, JWA & Associates, Darnell & Associates, and Tierradata.

Respectfully,

I-69a The commenter asserts that the EIR fails to mitigate the impact on viable agriculture. However, as described in Subchapter 2.3 and Appendix D of the EIR, the analysis of agricultural resources, Project-related impacts, and required mitigation is based on the County Agricultural Guidelines (Guidelines), with identified impacts and associated mitigation in conformance with applicable requirements. Specifically, the analysis determines that there would be significant impacts to approximately 13.1 acres of "important agricultural resources" (per Guidelines criteria) from the Proposed Project, with associated mitigation in the form of either: (1) providing off-site mitigation for the noted impact area at a 1:1 ratio through the acquisition of agricultural mitigation credits via the County Purchase of Agricultural Conservation Easement (PACE) Program; (2) providing a combination of PACE mitigation credits and establishment of on- and/or off-site agricultural easements (off-site) in appropriate areas (e.g., larger residential or other lots encompassing CDC candidate soils, pursuant to County approval); or (3) purchasing off-site agricultural lands or easements that meet the intent of the County Agricultural Guidelines (and are approved by the County).

The referenced "36 acres" in this comment is erroneously identified as a mitigation measure. The 35.4-acre agricultural easement area is proposed as a Project Design Feature to maintain the availability and viability of this area for potential agricultural operations through the HOA with farm manager/consultant direction. As described in Subchapter 2.3 and Appendix D of the EIR, the proposed development includes a Project Design Feature to establish a 35.4-acre agricultural easement (granted to the County) within the Project site (with applicable text in Final EIR Subchapter 2.3 and Appendix D modified to reflect the following description of the proposed on-site agricultural easement). This easement would protect the availability and viability of the easement area for potential agricultural uses. Specifically, due to the 2014 wildfire event and intermittent drought conditions, the agricultural easement area may not be used as an avocado orchard (with avocados typically requiring high irrigation levels). Rather, the easement area would be managed and maintained to ensure that it is available and viable for agricultural uses as noted, potentially including activities such as "stumping" the remaining and burned (dead) avocado trees; providing erosion, weed and rodent control; and maintaining the irrigation system used for previous agricultural operations. While no specific agricultural activities are currently proposed within the easement area, such uses may include avocados (should water become available again), vineyards and/or other

I-69a  
cont.

orchards that require less irrigation (e.g., pomegranates and olives). The agricultural easement would preclude development other than agriculture, uses incompatible with agriculture, and non-agricultural uses (except for the minor exceptions noted in the easement). The proposed 35.4-acre on-site agricultural easement is intended to ensure the availability and viability of the site for agriculture.

The proposed easement would be managed and maintained to protect the availability and viability this area for potential agricultural uses, which could be implemented directly through the HOA (i.e., by retaining a qualified manager/consultant/operator), or through options such as leasing or selling the easement parcel to a third party for agricultural development. An Agricultural Maintenance Agreement between the easement land owner(s) or lessee(s) and the County of San Diego would require proper maintenance of the 35.4-acre agricultural easement. The Agreement would be transferred to an individual property owner/lessee or the HOA as necessary, to the satisfaction of the Director of County PDS, with the associated text in Subchapter 2.3 and Appendix D of the Final EIR modified to reflect these elements:

- The property owner(s), lessee(s) and/or HOA will employ a qualified manager/consultant to maintain the 35.4-acre easement area in perpetuity and ensure that it is available and viable for associated potential agricultural uses. This may include activities such as “stumping” the remaining and burned (dead) avocado trees; providing erosion, weed and rodent control; and maintaining the irrigation system used for the previous agricultural operations (as outlined below). Agricultural fencing and signage shall be installed along the easement boundaries prior to approval of Project Grading and/or Improvement Plans, and shall be maintained as necessary.
- Signage will be corrosion resistant, a minimum size of 6 inches by 9 inches, spaced 100 feet apart, attached to fencing not less than 3 feet in height from the ground surface, and will state “County Easement: Agricultural Uses Only (Project Ref: TM 5575).”
- The wells and water distribution facilities used for previous agricultural operations within the 35.4 acre easement area will be properly maintained (including replacement as necessary). Specifically, the irrigation system will be maintained in an operable condition so that it is available for potential future agricultural use within the easement area, unless additional and/or replacement facilities are required/proposed. This could entail grading and construction for installation of additional (or replacement) wells and related facilities, as well as infrastructure for delivery of recycled water (when available) to supplement or replace the use of groundwater for agricultural irrigation.
- The Project’s HOA agricultural operations budget will include



I-69a  
cont.

10 years of maintenance operations, under the direction of a farm manager/consultant, unless conveyed or leased to a third party operator, which will develop and implement the maintenance operation based on an endowment or letter of credit to fund the proposed farming operation for 10 years. The cost estimate will be generated by the Project applicant and/or HOA and approved by the Director of PDS.

In response to the first bullet, potential agricultural operations within the proposed easement would be directed by a qualified farm manager/consultant/operator and subject to the same physical, economic and other conditions as any other local agricultural operation (e.g., irrigation, infrastructure, and maintenance costs, etc.). There is no evidence to support the claim that the proposed easement and related activities would be "...manufacturing unfair competition..." as asserted in this comment.

In response to the second bullet, the proposed 35.4-acre agricultural easement would not result in "...taking these 16 [sic] acres out of the farming market..." as stated in this comment, but rather would ensure that this area is available and viable for agriculture as part of the long-term Project site operation. As indicated above in this response, the proposed easement and associated potential agricultural use is not considered to represent any type of "unfair competition" or an impediment to other (off-site) agricultural operations, as any potential on-site agricultural uses would be subject to similar related conditions such as cost, market fluctuations, and climatic variations. The conditions of approval do not commit the HOA to produce a particular crop. Additionally, as previously noted, the proposed on-site agricultural easement and related operations do not comprise mitigation (with separate mitigation required as stated), and therefore do not require conformance with the County Agricultural Guidelines and/or the PACE Program.

In response to the third bullet, the farm manager/consultant would be employed by the property owner(s) and/or HOA as described, and the farm manager/consultant would oversee the easement area (i.e., not the property owner[s] and/or HOA). Agricultural activities conducted within the easement area would be directed by individuals who possess appropriate agricultural expertise and experience as noted to conduct the described farming operation (e.g., a qualified manager/consultant/operator, or lessee), with potential issues related to costs and interface conflicts similar to any comparable local agricultural site.

It should also be noted that agricultural operations have been conducted within the proposed 35.4-acre easement area (as well as adjacent and nearby on-/off-site locations) over the past several decades, with no known substantive issues related to interface conflicts (including off-site residential properties to the north and east in closer proximity to agriculture uses than the proposed residential sites in Neighborhood 4). The assertion that "...after the 10 year endowment runs out, on-site agriculture would be abandoned and it would likely never be available to farm..." is speculative and unsupported by the conditions proposed

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- I-69a cont. to be attached to the associated Agricultural Maintenance Agreement. Specifically, as listed above, a qualified farm manager/consultant would oversee the 35.4-acre easement and ensure that this area is available and viable for agriculture in perpetuity.
- I-69b Please refer to response I-69a. Leasing has been added as an option, as suggested by this comment.
- I-69c In response to the fifth bullet, any potential agricultural activities conducted within the proposed 35.4-acre on-site agricultural easement would be managed by an individual (or individuals) with agricultural expertise and experience. Accordingly, any associated agricultural operations, while subject to similar market, climatic and other conditions as comparable local agricultural sites, would be anticipated to be viable and ongoing.
- I-69d In response to the final bullet, applicable portions of the site under the General Plan Density and Septic Option alternatives include minimum 2-acre lots in areas with CDC Prime or Statewide Important candidate soils. Accordingly, as outlined in Sections 4.3.2 and 4.7.2 of the EIR, these alternatives would likely result in fewer direct impacts to agricultural resources than the Proposed Project (with the associated EIR text modified to clarify this point; see Responses I-32, I-42, and I-43 for additional discussion of modifications to the General Plan Density Alternative in the EIR). As concluded in the EIR alternatives analysis, however, both noted alternatives would fail to meet most of the stated Proposed Project objectives.
- I-70 The issues raised in this letter have not included significant new information. The County respectfully disagrees that the EIR needs to be re-circulated based on the responses provided to the comments contained in your letter.

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COMMENTS

RESPONSES

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Bill Osborn,  
Co-Chair  
Friends of Eden Valley For responsible Development

Attachment: Union Tribune article 6/5/2014

CC: Greg Cox  
Bill Horn  
Dianne Jacobs  
Dave Roberts  
Ron Roberts  
Mark Wardlaw

COMMENTS

RESPONSES

Cocos fire traffic jams to be reviewed  
By [Teri Figueroa](#) 11 A.M. JUNE 7, 2014



Traffic backs up along San Elijo Road at its intersection with Elfin Forest Road during the Cocos fire on May 14. — *Photo courtesy Randy Houghton*

**SAN MARCOS** — Within the first two hours of the Cocos fire, with black smoke cresting the hill and winds whipping west, hundreds of San Elijo Hills residents decided it was time to get out.

But the main road out of town was clogged with neighbors also intent on leaving. Many said it took an hour or more to get through the gridlock.

“Trying to remain calm and not panic — that was probably the scariest part. (I had) that feeling of ‘stuck,’” said resident Alicia Stephens, who hit the road with her three young children not long after the fire started.

That traffic tie-up is on the list of things San Marcos officials want to evaluate in the aftermath of the fire to determine what worked and what needs a fix.

I-71

This comment is an attachment of a news article dated June 7, 2014 titled, Cocos fire traffic jams to be reviewed, by Teri Figueroa. It recounts the difficult and terrifying evacuation during that fire. This is not a comment on the EIR and no response is required.

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"You learn from every event, and we will do that here," San Marcos Councilman Chris Orlando said last week.

The Cocos fire started around 3:30 p.m. May 14 in the hills behind Cal State San Marcos. Over the next few days, it burned nearly 2,000-acres in San Marcos and Harmony Grove, and destroyed three dozen homes. It came with a price tag upwards of \$10 million, between firefighting efforts and recovery.

Within hours of the blaze erupting, thousands of people fled their homes including those in master-planned San Elijo Hills community on the south side of Double Peak Park, a San Marcos hilltop with panoramic views of North County.

There are essentially three ways out of San Elijo Hills, and all rely on the main route through the community — San Elijo Road. Nearly all the residents use that road to access their neighborhoods.

To the west, San Elijo Road hits Melrose Drive and Rancho Santa Fe Road. To the east, it becomes South Twin Oaks Valley Road. There is also Elfin Forest Road, a backcountry route into Escondido through brushy open space that burned in the 1996 Harmony Grove fire.

On the afternoon of May 14, people fleeing San Elijo Hills weren't heading onto South Twin Oaks — that's where the fire was coming from. Most headed to San Elijo Road with plans to go west.

But the number who wanted out and the time of day — rush hour — left traffic at a standstill.

Longtime resident Dustin Smith said he packed up his pets and headed off about 4:15 p.m., but couldn't leave his gated Promontory Ridge community. In front of him was a line of vehicles backed up even before the gate. Those drivers were waiting for their turn to squeeze onto another packed road, one that eventually led to an already-full San Elijo Road.

"It caused for a lot of anxiety," Smith said, adding that the drivers appeared to remain calm in the face of the gridlock. "But in the moment, you realize that if you start seeing flames up the hill, you gotta run out of there, because you would not make it out in a car."

He said he gave up, tried again an hour later but found the same situation. Tried again shortly after 6 p.m. and finally found roads clear enough to leave.

Resident Marla Trussell said she had packed up but stayed until midnight.

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"I didn't want to get stuck in a huge crush and stampede of people leaving," Trussell said. "That situation looked more dangerous than the fire," which she said she surmised was still at a distance.

"At the end of the day, we need more ingress and egress out of this community — and I have no idea how they are going to do that," Trussell said.

Sheriff's Capt. Scott Ybarrondo, who runs the San Marcos station, said deputies were initially deployed to go door to door to evacuate neighborhoods facing the most immediate fire threat, including Coronado Hills, just east of San Elijo Hills.

From there, some deputies were moved to San Elijo to help with evacuations and to direct traffic.

Eventually, once there was enough manpower for road closures, traffic on all lanes of San Elijo Road was directed westbound toward Rancho Santa Fe.

Ybarrondo said his department will meet with other agencies — including the city, CalTrans, and the California Highway Patrol — to delve into what went well during fire evacuations and what improvements need to be made.

"My biggest message is that we had no serious injuries and no loss of life," he said. "No matter how successful we are, we always want to be better — and that is what we are going to do in this case."

Councilman Orlando, a San Elijo resident, said reviews of the incident can bring about improvements. He pointed to concerns residents raised in 2007 regarding lack of information from the city during wildfire evacuations at that time. That led directly to continual fire-related updates on the city's website during the Cocos fire, he said.

"You are obligated to learn what you can, and be better next time," he said.

Orlando also said that what is most important is that everyone affected by the Cocos fire got out safely.

None of the property losses were in San Elijo. Residents said they were relieved that the fire never hit their community, and repeatedly expressed gratitude to the first

I-71  
cont.

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cont.

responders and firefighting efforts. Stephens also noted her joy at seeing the community come together after the fire.

“That was wonderful to see good come from something so terrible,” she said. “But being stuck and not being able to get away was terrifying.”

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<sup>i</sup> EFHG Community Plan.

[http://www.sandiegocounty.gov/pds/docs/CP/ELFIN\\_FOR\\_HARM\\_GROVE\\_CP.pdf](http://www.sandiegocounty.gov/pds/docs/CP/ELFIN_FOR_HARM_GROVE_CP.pdf)

<sup>ii</sup> “*There is a lack of established neighborhoods, as well as public services. As such, there is no existing community on site to divide.*” PDS2013-SP-13-001-DEIR-Chap3.1.4-Land-Use-Planning.pdf