

January 30, 2017

To: Martha Blake, Development Services Department, City of San Diego
From: Friends of the San Dieguito River Valley

Subject: Comments on Hacienda Del Mar Project No. 488318/SCH. No. 2016121081, Page 1 of 3

The Friends of the San Dieguito River Valley spoke at the January 19 Public Scoping Meeting for Hacienda Del Mar and are also submitting the following written comments regarding the potential environmental impacts of the proposed project.

1. The site contains wetlands documented in the U.S. Fish and Wildlife Service National Wetlands Inventory. The environmental impact on these “Freshwater Emergent Wetlands” must be included in the scope of the EIR, as well as the impact on the migratory birds that are found in the wetlands during certain times of the year.

2. The site is within 100 year flood plain documented by the USGS (United States Geological Society). The environmental impact on the floodplain, the adjacent residents, residents to the north and the San Dieguito River basin must be included in the scope of the EIR. The EIR must also consider the project’s impact on and consistency with the County’s Flood Management Plan. Specific attention must be directed at Goal 1.D: Limit future development in hazardous areas which includes “... respect environmental characteristics; Section 8: “Encourage ...preservation of the significant natural features of the County including lakes, basins, river banks and waterways, encourage...and designate appropriate areas as ...water-related wildlife preserves. Protect life and property by regulating uses in areas subject to flooding, and control development to assure a minimal adverse polluting effect on ...groundwater supplies” and page 8-10 Low-Density Zoning. Note that the San Dieguito River Valley where this site is located is considered a “Hot Spot” for flooding in the Flood Management Plan.

3. The site is within the San Diego Municipal Code Chapter 13: AR 1-1 Zone which limits development to one dwelling per 10 acre lot for lands “that are not appropriate for more intense zoning.” The EIR must consider the impact on this policy and the adjacent low density residential areas.

4. The site of the proposed development is within Landscape Unit A, Del Mar Coastal Lagoon; of the San Dieguito River park Focused Planning Area. The EIR must address the project’s impact on the “Special Design Considerations for this Landscape Unit” as outlined on page 40 of the San Dieguito River Park Plan:

Sweeping open space views within this landscape should be preserved.

Future development should be compatible with the open space character of the lagoon area in terms of both visual compatibility and intensity of use.

All uses...should be screened...in order to reduce adverse impacts associated with noise, lighting, stray pets and intensive human activity.

5. Further, the site is adjacent to an Open Space Easement that buffers the River Park's Coast to Crest Trail for hikers, equestrians and bicyclists. What will be visual impact of the project on Trail users?

As importantly, the Friends of the San Dieguito River Valley have great concern with two issues specifically: traffic and the drainage of water. We want to see traffic counts done on both entrances to the polo fields, the property adjacent to the Hacienda Del Mar property

We ask the EIR to include traffic counts at both driveway entries to the polo fields, El Camino Real and Via de la Valle, during Surf Cup Soccer and Lacrosse tournaments, as well as soccer practices, and during the Fair and racing seasons. Via de la Valle becomes jammed with cars for events and practices at the polo fields, on a very regular basis, year round. Your EIR investigation should include a request from Surf Cup Soccer for a calendar of events for a full year, bearing in mind that Surf Cup does not routinely include soccer practices, or special events, in their schedule of activities. And further, the impact of traffic on the ability of Hacienda Del Mar to provide emergency medical services.

Our second issue is water drainage. Both HDM and polo fields properties are wetlands and in the flood plain. All waters from both properties, HDM and the polo fields, drain into the San Dieguito River. As was heard at the January 19th scoping meeting, uphill septic tanks in multitudes routinely flood, and then drain downhill, allowing their contents to move toward the river. The impact of the proposed project on a site that currently accommodates flooding must be analyzed and the subsequent increased drainage into the San Dieguito River must be covered in the EIR.

CUMULATIVE IMPACTS

We feel the EIR must take into account the fact that both the HDM site and the Polo/Soccer fields immediate to the south are in the documented wetland and flood plain. And what would be the impact on traffic taking both sites into consideration? Horse Park, a very active equestrian center is also directly across from the polo fields on El Camino Real and generates considerable traffic for their events.

The number of daily visitors to the facility could easily be triple the number of occupants when including family/friend visitors, staff and service personnel, food and other delivery vehicles, and (very significantly) ambulances and other emergency vehicles. A nightmare scenario of an ambulance trying to get to the facility on the same day as a major polo field event is not at all unlikely. Put in the form of a question: What happens when an ambulance is required at Hacienda del Mar at the same time Via de la Valle is clogged with traffic going to or coming from a major soccer event at the polo fields. This problem is compounded by the fact that in many places along Via de la Valle there are no shoulders.

EFFECTS FOUND NOT TO BE SIGNIFICANT

WE DISAGREE with the Environmental Analysis that states that the Human Health/Public Safety issue area is not potentially significant with the proposed project and does not require analysis. The proposed project is for senior citizens, many in an assisted living and medical units. Because the proposed site is in a flood plain surrounded by already overburdened single lane street systems there could easily be a significant impact on the occupants' health and safety in a medical emergency. For instance the EIR should analyze how the response capabilities of emergency vehicles going to and from the proposed project would be impacted by traffic from events at the adjacent surf cup/polo fields and nearby Del Mar Race Track, Fairgrounds and Horse Park. Commuter traffic must also be taken into consideration as both Via de la Valle and El Camino Real are routinely tied up during these hours. Finally the impact would be in even more significant in the case of heavy rains and flooding.

Thank you for the opportunity to comment on what issues to include in the Environmental Impact Report for Hacienda Del Mar.

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