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20223 Elfin Forest Road
Elfin Forest, CA 92029

September 24, 2015

San Diego County Planning & Development Services

Attn: Peter Eichar

5510 Overland Avenue, Suite 310,

San Diego, CA 92123

RE: Response to NOP for EIR for the Harmony Grove Village South Project – PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS-REZ-15-003, PDS2015-TM-5600; PDS2015-MUP-15-00

Dear Peter,

As the draftees of the Elfin Forest Harmony Grove Community plan, which this project is subject to, we thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Harmony Grove Village South Project.

Project Description

There are several potential impacts within the project description section, which need to be fully analyzed in the EIR. The project property is located:

- outside of the existing sewer service district recognized by LAFCO, yet claims through LU 1.4 to be part of an existing Village;
- beyond the Village Limit Line established and recognized by the County’s General Plan, outside of which no VR designations are permitted;
- within the rural periphery buffer for the Harmony Grove Village project, which destroys the buffering functionality of the Community Development Model for the existing village;

If the applicant is claiming being part of an existing Village, which does implement a CDM throughout, the impact and logic of not following the Community Development Pattern of the entire Village needs to be studied, not only as to whether density should logically follow the least dense pattern on the outskirts of the CDM, where the project is located, but also whether it necessitates a change to this important General Plan Policy, and the subsequent impact throughout the county.

Further, the HGVS project design itself does not include a rural buffer with larger lots and horse keeping properties, as does the existing HG Village Plan. The existing Community Development Model, in compliance with LEED-ND criteria, negotiated by the community in good faith, included a village design that encouraged pedestrian activity with urban densities less than ¼ mile in radius from the core of the existing village. This proposed GPA would add urban densities well beyond ¼ mile and up to over 1 mile from the existing village core and outside of the Village Limit Line and the sewer service boundary, transform buffer areas between the urban density and existing rural residences into high density residential, and disturb the carefully crafted urban-rural balance.

A description of the inclusion of this project into the historic, over 120-year-old Harmony Grove rural community and its long-standing representative citizen's group, the Elfin Forest Harmony Grove Town Council, should be added to the project description. In addition, the impact of the potential breach of trust of the agreed overall planning scheme for the valley should be studied, not just for this area, but for the impact to every planning area in the County. From an overall planning perspective, this backfill clustered housing project would result in checkerboard development, which contravenes the adopted goals and maps of the General Plan (see Guiding Principle 2, p 2-7 to 2-9; Guiding Principle 10, p. 2-14 to 2-15)).

Land Use and Planning

LU 1.4 vs LU 1.2:

As demonstrated in the letter sent on our behalf by Shute, Mihaly and Weinberger dated June 25, 2015 and attached as part of our comments, the project is not adjacent to an existing village and therefore cannot claim an expansion under LU 1.4. If the County determines that the meaning in LU 1.4 of "only where contiguous" can be loosened to include "near," all occurrences of the word "contiguous" in the GP are subject to reevaluation with this new meaning of "near," and the financial and planning impacts of this decision must be evaluated County wide. For example, GP Policy LU 6.7 requires wildlife corridors to be established in "contiguous" open spaces. How would this affect the Multiple Species Conservation Program if this interpretation of "contiguous" would allow gaps between two or more corridors merely "near" each other? The planning impacts and legal costs of determining and supporting an arbitrary definition of "near" for the entire County wide GP should be studied.

If LU 1.4 does not pertain to this project, then the project should be evaluated for consistency with LU 1.2, which prohibits leapfrog development with village densities outside of established village or sewer service boundaries.

Consistency with Harmony Grove Community plan:

The proposed project destroys the existing and essential buffering function of the project site itself, which was carefully considered as part of the adoption of the Harmony Grove Village

project. This impact needs to be fully analyzed. In addition, the EIR needs to specifically address consistency with adopted Community Plan policies such as septic only outside the Village Limit line, 1 acre minimum lot size, large animal keeping, and the like.

Public Services.

Fire and Emergency Services

Current and future residents alike could be facing a perilous situation during an emergency such as a mass evacuation due to a wildfire or an earthquake. The project as currently proposed has only one exit onto Country Club Drive. This design of one egress would compromise safety during evacuations as Country Club Drive, which dead ends to the east, serves as the only exit route for existing residents beyond the project area. The EIR needs to fully analyze evacuation scenarios - including existing residents and their large animal livestock - with the most recent fire behavior data available, including the 2014 Coco's fire.

The project area is adjacent to Standard Pacific's temporary Construction Trailer and lay down areas; the open spaces around these structures burned from the Southern terminus of Country Club Drive to Harmony Grove Road during the 2014 Coco's fire. This area of Harmony Grove lost more than 30 homes and several out buildings only a few hundred feet from the proposed project location.

Road Improvements

Improving the current roads may not be sufficient to allow the existing residents with their horse trailers to evacuate in time once the HGV, Valiano, and HGVS projects are fully built out, especially with the Citracado Parkway extension delayed, and a doubling of the Sprinter line schedule, which already creates a bottleneck for evacuation to the North. The EIR should study worst case conditions at full build-out without Citracado Parkway to evaluate whether current residents and future residents of HGV, Valiano, and HGVS could safely evacuate on Country Club and/or Harmony Grove Road.

The most useful analysis would determine the maximum number of dwellings in the valley to allow for safe egress in case of emergency evacuation given the number of existing residents. Prevailing winds and past fire emergencies patterns, and prevalence of substandard private roads should be modeled to determine the wisdom of adding several thousand people in a bottlenecked valley already at the wildland-urban interface.

The possibility for fatalities due to the entrapment of people and animals on these rural roads, and possibly the nearby local highways should be studied as part of this project EIR. Please note that in a wildfire roadway entrapment scenario, large animals cannot be removed from trailers when there are stationary vehicles behind the trailers prohibiting the lowering of the rear exit ramps. Horse trailers are particularly susceptible to catching fire by windblown embers because they have large open windows and are filled with dry wood shavings. Thus, tragically, hundreds of horses could be trapped in their trailers and killed by fire, or let loose and die if roadways are congested or blocked during evacuations (as seen in the Valley Fire in northern CA, that is still burning as of this writing – where picture below was taken)



Recreation.

This project does not include any public parks. The residents of the 453 units will no doubt use the community's only public park in Harmony Grove Village, which was designed to be a meeting place for village and rural neighbors. The impact on this park by a GPA of the magnitude proposed with 453 neighboring homes should be studied and mitigated within the community. Unlike all existing or approved dwellings in the community plan area, a majority of proposed dwellings do not include private yards to recreate; the EIR needs to fully analyze the impact of a) use of existing public recreation areas at a higher rate by these proposed residents, including impact on GHG and VMT to get to said recreation, and b) the potential impact on existing residents' recreational amenities such as large animal keeping of adding apartment dwelling neighbors who may object to odor or other vectors currently existing within the community.

Transportation and Traffic.

This Town Council Board worked diligently with County staff and applicant to craft a compromise to mitigate the project traffic impacts of HGV. This mitigation measure was the downgrading of rural roads surrounding the project to minimize impact to existing residents. Country Club Drive (designed to handle only 4,500 ADTs) and Kauana Loa Drive are non Mobility Element roads. They are now at risk of being added back to the Mobility Element Plan due to the added project traffic. A GPA of the magnitude proposed, especially when combined with the change in planned improvements in Escondido, could jeopardize years of good faith collaboration, and result in these roads needing to be reclassified to accommodate the additional traffic impact.

In addition, the added stress of the increased density on the areas' private roads and the financial impact on local residents responsible for maintaining those private roads should be studied and mitigated. This analysis needs to extend to the private roads in Elfin Forest, which currently serve as cut-through routes to traffic from Escondido and the project area. Private property

owners pay to maintain these roads with no mean to restrict access to deeded easement owners exclusively, and any added density in Harmony Grove will result in added traffic impact on these private roads. The EIR needs to fully analyze the additional financial burden to private property owners from project use and consider adequate mitigation.

The traffic impact on intersection of Elfin Forest Road and Twin Oaks Road need to be analyzed since it is the first intersection to the West of the project; analysis needs to include emergency evacuation conditions for traffic impact, noting that in last local emergency (Coco's fire) traffic at that intersection was at a standstill with flames overhead on the hills. Impact of project traffic on the ability of other residents to evacuate via the West needs to be fully studied.

The EIR should also study the incremental and specific impact of the project on the construction of long-planned infrastructure like a bridge over the Escondido Creek, a Federally-funded project years in the planning that the applicant is touting as a project benefit, but which the community believes will occur independently of this project.

Agriculture and Forestry Resources.

The Harmony Grove Community Plan calls for encouraging family owned farms; the impact of removing the agricultural land and in its place putting high density clustered units should be studied.

Aesthetics

The proposed project calls for a mix of structures including multi-family and single family homes. Structures will range from one and half stories high to three and half stories high, the maximum height being 64 feet. This is more than double the height of homes in the neighboring vicinity, including homes in Harmony Grove Village. This is in direct conflict with the character of the community, which includes one and two story single family homes on large lots; large animal facilities on residential properties; no walled developments, and no gated communities.

The aesthetics impacts to the existing community include the obstruction of view of the rolling hills, the ridgeline along the western edge of Harmony Grove which is a locally important historic visual resource called the "Lady of the Valley," and it will also greatly impact the scenic vistas from Harmony Grove Road, part of the scenic County Highway System. The amount of light and glare from such a large clustered development would jeopardize the community's dark skies policy and should be considered a potentially significant impact. No amount of disguising large apartment blocks as "granaries" can mitigate for the aesthetic impact of bulk and scale completely out of harmony with any of the surrounding properties south of Country Club Drive.

Further, the EIR should examine the aesthetics impacts of losing the Community Development Pattern, which aims to bring visual harmony between a village and its surroundings.

Biological Resources

This project is located within the draft North County MSCP and is located within an area designated as the Pre-approved Mitigation Area (PAMA). The goal of this plan is to conserve 75% of natural lands in the PAMA. The applicant is proposing that 75 acres of the 111 acre site

will be dedicated to landscaping, gardens, or biological open space. This doesn't appear to meet the criteria of conserving 75% of the natural lands on the project site, which would be 83.25 acres. This should be studied closely for accuracy of land use (natural land, not landscaping and gardens) and the appropriate conservation measures as required by PAMA.

There are a number of species on the project site that are listed as State and/or Federally Endangered and/or Threatened. CAGN and LBV have been documented within the project site. In addition, Mammal trapping surveys should be done because the area has been in the historical range for the Stephens Kangaroo Rat, and the northwestern pocket mouse.

Because the State of California has been in a drought pattern for several years, rare plant surveys are likely inaccurate. Rare plant Surveys should be performed after an adequate year for rainfall, and because there are clay soils present on site, a vernal pools survey should also be considered.

The non native grasslands that are present onsite are an important local resource to a number of protected avian species and potentially sensitive reptilian and mammalian species that rely on this resource for foraging, burrowing, and nesting. Because the area has been untouched for a long time, there are a number of native plants that have reestablished in the area, making rare plants surveys in this area necessary as well.

There are a number of bat species recorded in the area. Because the project site has the Escondido Creek, large rock formations nearby, and open fields providing for ideal bat foraging, surveys should be conducted to determine what protected bat species would be impacted by this project.

The proposed project would impede wildlife access to and from areas onsite and offsite, and create hazardous environment for wildlife with a suburban/wildland interface that would be impossible to balance. A development of this size would bring in domestic cats and dogs, subject the wildlife to further impacts by predation, disease, poison, roadkill, and other stresses that need to be studied in the EIR.

Cultural Resources:

Harmony Grove is the oldest of the San Dieguito communities, named by the Spiritualist Association that incorporated there in 1896. Luiseno and Diegueno occupation is evident. Prehistoric resources in the surrounding areas include petroglyphs, pictographs, some habitation sites, bedrock milling sites, a lithic scatter and, there are several buildings that appear on the 1889/1891 San Luis Rey 15' topographic map, and some of these are still standing. For example the remains of an adobe structure stand near Country Club Drive and Cordrey Lane on the project site.

Greenhouse Gas Emissions

How will the project adequately mitigate for potentially significant impacts, when there are no adopted mitigation measures at this time?

“The new Climate Action Plan (CAP) for the County of San Diego will be a comprehensive Plan that will outline the specific activities that the County will undertake to reduce Greenhouse Gas

(GHG) emissions in the unincorporated communities of San Diego County. The CAP will also aid the County meet State mandated GHG reduction targets. The CAP will focus on activities that can achieve the greatest GHG emission reductions in the most technologically feasible and cost-effective manner. Project completion is anticipated in the Fall of 2017.”

Project Alternatives

We respectfully request as one of the alternatives analyzed a project consistent with the Harmony Grove Community Plan, at the original density established by the Community Development Model agreed upon by the community and the County (~25 units) and embedded in the Staff Land Use Map during the General Plan Update process. This Town Council Board is on record advocating against the 176% increase in density the site received as part of the Property Specific Requests, which was politically motivated, completely inappropriate for the site, and potentially subject to reevaluation.

Thank you for the opportunity to comment.

Angelique Hartman



Chair, Harmony Grove Meadows Committee

Elfin Forest/Harmony Grove Town Council