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Elfin Forest, CA 92029

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San Diego County Planning Commission

RE: Lilac Hills Ranch Draft Final EIR, PDS2012-3800-12-001 (GPA)

To Whom It May Concern::

As a council elected by members of our community, we are tasked with commenting on projects or programs that may affect our community either directly or indirectly through the precedent these decisions set.

About Elfin Forest / Harmony Grove

Elfin Forest and Harmony Grove are in an unincorporated part of San Diego County. Most people move to our community to enjoy the beauty and tranquility of this open space and to live a rural, residential lifestyle.

Our community has been very actively involved in the General Plan Update and in fact, worked hand-in-hand with County Staff to help craft a plan that both respects the need to absorb growth in the County while at the same time preserving the community character and rural environment we espouse. We were encouraged and supportive of the Board of Supervisors who overwhelmingly voted to approve the General Plan which took over a decade and 18 million dollars of taxpayers to develop.

We are commenting on the Lilac Hills Ranch project because we believe that its approval would set a precedent that is wrong for San Diego County and would go against what is best for the residents of the unincorporated County, and the residents of Elfin Forest and Harmony Grove in particular.

About Lilac Hills Ranch

The Lilac Hills Ranch proposed mixed-use residential and commercial land uses, consisting of 1,746 dwelling units on 608 acres, are not consistent with the existing General Plan Land Use Designations of Semi-Rural and Rural Residential. This requires a General Plan Amendment and changes to the Valley Center and Bonsall Community Plans, which both Planning Groups voted against. This project also seeks to re-zone what is now predominantly agricultural land zoned as "Limited Agriculture" (A70) to Village Residential (VR 2.9) and Village Core (C-5). The REIR indicates that the site is a significant agricultural resource impacted by the significant loss of Important Farmland and 43.8 acres of soils of Prime or Statewide Importance.

General Plan Amendments

As a general rule, the EFHG Town Council does not object to projects that are consistent with the General Plan (including Community Plan consistency). In this case, the proposed development proposes a general plan amendment that not only massively increases density in the proposed area, but also increases the pressures on public infrastructure, increases congestion, greenhouse gases and decreases public safety without satisfactory mitigation of these effects.

The Project creates the potential for negative "precedent setting" as it proposes an amendment to the General Plan to accommodate higher densities; future projects (including those proposed in our area) may follow suit in seeking similar amendments. In addition, this Project represents a development pressure on surrounding agricultural uses and large lots to convert to high density residential or commercial.

Under the general plan, amendments are allowed if they are in the public interest and not detrimental to public health, safety and welfare:

Any proposed amendment will be reviewed to ensure that the change is in the public interest and would not be detrimental to public health, safety, and welfare. Environmental review is required for substantive General Plan amendments.

The DFEIR does not establish that approving this project is in the public interest and it does not mitigate for the harmful effects the project will have on public health, safety, and welfare.

Leapfrog Development LU 1.2

The General Plan prohibits leapfrog development, except for new LEED Neighborhood Development (ND) certified Villages. However, a LEED prerequisite stipulates development be sited in a Smart Location with existing infrastructure and nearby multimodal public transit, job availability and public services, thus, precluding this project, located 45 miles from San Diego.

Rejecting the GP Vision of Smart Growth

Approving a GPA for this project requires rejecting the GP's fundamental vision of Smart Growth for San Diego County. Smart Growth is defined in the General Plan in two ways. One is the locating of villages into areas where infrastructure and facilities are already established:

Smart growth concepts focus growth in compact areas close to jobs, services, and public facilities to maximize the use of existing infrastructure and preserve open space and natural resources.

The other is retaining and/or enhancing the County's rural character economy, environmental resources and unique communities:

This document replaces the previous General Plan and is based on a set of guiding principles designed to protect the County's unique and diverse natural resources and maintain the character of its rural and semi-rural communities.

By dropping a 608 acre village of 5000 people into a infrastructure-lacking rural and semi-rural land, this project violates these very crucial tenets of the General Plan.

Fire Safety

We have witnessed first-hand what effect planning can have on fire safety and evacuation dangers. During the Cocos Fires of 2014, the development adjacent to our community, San Elijo Hills, had residents stuck in an hour long traffic jam trying to exit their cul-de-sacs and side roads to evacuate from a fire that was visible on the hillside above. Through happenstance, the fire that was raging nearby was blown easterly and did not ravage the thousands of residents stuck who were attempting to evacuate¹. Actual home video footage shows parents desperate to evacuate as the fire raged overhead².

This project is located within an urban-wildland interface that has an inherent high fire danger. It will require appropriate ingress/egress routes that must not block the evacuation of current home owners' vehicles and large animal trailers. We believe this high density will place too much strain on the existing rural road system and fire protection services and does not appear to adequately mitigate for these potential effects.

¹ Article in the Union Tribune: <http://www.sandiegouniontribune.com/news/2014/Jun/07/san-elijo-traffic-review-cocos-fire-san-marcos/>

² https://www.youtube.com/watch?v=_YT77dRYc2Q&list=PLMvVRf4RImXepkltC8DeNNucvQb8Jy6xI&index=5

In Conclusion

The Elfin Forest Harmony Grove Town Council believes that this project is not suitable for this location. We urge you to adhere to the principles and guidelines of the General Plan and deny the General Plan Amendment, re-zoning and the Community Plans changes.

Respectfully,

JP Theberge
Vice chair, EFHG Town Council

Cocos fire traffic jams to be reviewed



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.

“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.

"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 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.”