## Comments

**Comment Letter O7**

June 19, 2017

Via Electronic Mail

Ms. Ashley Smith  
Land Use & Environmental Planner  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

E-Mail: Ashley-Smith2@sandiego.ca.gov


Dear Ms. Smith,

Save Our Forest and Ranchlands (“SOFAR”) and the Cleveland National Forest Foundation (“CNFF”), two organizations dedicated to progressive land use planning and the protection of vital natural resources, are submitting comments on the Draft Environmental Impact Report (DEIR) for the Harmony Grove Village South Project. We offer the following comments regarding the Project, its inconsistency with the County’s General Plan, and the Draft Environmental Impact Report’s (“DEIR”) failure to accurately analyze these inconsistencies.

General plans represent a legally enforceable “constitution” that governs land development. They also represent a community’s vision for its future. The current County General Plan took over a decade to finalize at the cost of $18 million dollars. Although much rural land was zoned with large lot zoning to preserve rural values of farming, watershed, and wilderness, it was in fact a compromise with the forces of sprawl development. This compromise resulted in the direct conversion of 55,063 acres of...

### Responses

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<th>Response to Comment O7-1</th>
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<td>The County acknowledges these introductory comments; however, they do not raise an issue concerning the environmental analysis and adequacy of the EIR. Please see the responses below to specific comments.</td>
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<th>Response to Comment O7-2</th>
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<tr>
<td>Comments noted. As a general policy comment, it is not an EIR-related issue that requires response. It is noted, however, that as stated in the County’s General Plan Update (2011) on pg. 1-15:</td>
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> The General Plan is intended to be a dynamic document and must be periodically updated to respond to changing community needs.

> 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.

Please also see the Global Response to Project Consistency with General Plan Policy LU-1.4.

The Project does not result in a conversion of agricultural lands. There are no existing on-site agricultural uses to conserve, as indicated in Figure 2.3-1, *Vegetation and Sensitive Resources*, and in Chapter 4.0, *Alternatives*, in the description of the Section 4.2.1, *No Project, No Development Alternative Description and Setting*, which references the “native and non-native habitat throughout the site.” Potential direct and indirect agricultural impacts are addressed in Section 3.2.1, *Agriculture*.

The comment lists several general environmental issues and perceived deficiencies but does not provide any specifics as to how or why these items are deficient. Therefore, no specific response is possible. Each of the items noted, however, is subject to substantial discussion in the EIR. The Project’s relationship to the General Plan and Community Plan is addressed in detail in the FEIR Chapter 1.0, *Project Description, Location and Environmental Setting*, and Section 3.1.5, *Land Use and Planning*, which also includes detail...
farmland. With this massive sacrifice in mind it is unconscionable for Harmony Grove South to be asking for the further conversion of rural or agricultural lands especially when you consider the other unmitigatable impacts such as air quality, biology, traffic, and cost of sprawl services: police, fire, water, and sewer. The Harmony Grove community also made a compromise in their community plan when they agreed to more than double their density during the General Plan update. Now this project comes along with a dramatic increase in density on designated rural land, and Harmony Grove South is not alone. There are a dozen other privately initiated general plan amendments which ask the County to convert an additional 11,575 acres of agricultural lands. Specific Plan requests take another 15,000 acres.1

The basic justification being used by planners and developers alike to convert general plan designated rural lands is to meet the housing crisis. It is a false argument.

As detailed in the DEIR, the project site’s existing land use designations are Semi-Rural Residential (SR-0.5) and Rural Lands (R1-20) and under the existing designation, the Project site could result in a maximum of 220 dwelling units. The Project proposes to construct 435 dwelling units and 5,000 square feet of commercial or civic uses.

From the summary of alternatives in the DEIR emerges the stated purpose of the project to serve housing needs. “Although this alternative would reduce some impacts and be consistent with the General Plan, it would not achieve the underlying purpose of the Project of accommodating a portion of the projected population growth and housing needs in San Diego County by expanding an existing village that will further enhance and support the success of that village.”2

The so-called housing need argument, being utilized for this project and many other proposed General Plan amendments is specious. Studies have shown that there is sufficient zoned land in the cities and county to support the housing needs through 2030 and likely beyond. The so-called housing crisis is a manufactured crisis that sidesteps the real acute need for a regional transit first policy to activate those currently zoned lands in the urban cores.

On July 12, 2010, CNFF released an infill study that used data from the San Diego Association of Governments (“SANDAG”) to determine that with existing zoning there is enough development capacity to accommodate approximately 460,000 new homes in the incorporated areas (cities) of San Diego County. SANDAG recently determined that the region will require 230,000 new housing units in San Diego County by 2030, demonstrating that without making any changes to zoning, all of the region’s projected housing needs for 2030 could take place as infill development (within the incorporated

1 https://sdsu.coorslibrary.org/wc-content/uploads/2015/06/Active-0PA2M4c-nst4b2.pdf
2 http://www.sanecounty.com/content/download/21631/32887/file/ProjectHearingHwy/Harmony%20Grove%20MIT%20Public%20Hearing%20Summary.pdf

Response to Comment O7-3
Comments noted; however, these comments do not address the adequacy of the EIR and therefore do not require a response.
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| **RTC-O7-3**

**Response to Comment O7-4**

The County concurs with the commenter’s statement regarding the “General Plan Consistent with Septic Alternative.” The EIR does conclude that it would reduce impacts to transportation/traffic, noise, and air quality when compared to the Proposed Project; however, the Project does not have to justify the need for the Project or increased housing.

**Response to Comment O7-5**

Please see the Global Responses to General Plan/Community Plan Amendments CEQA Impact Analysis and Project Consistency with General Plan Policy LU-1.4 for reasons the County disagrees that the Project fundamentally conflicts with policies of the General Plan and Community Plan.

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1. [https://drive.google.com/file/d/1qrpUSd3Z82Y8KSoCnLww8otR3vWQfH3Q/view?usp=sharing](https://drive.google.com/file/d/1qrpUSd3Z82Y8KSoCnLww8otR3vWQfH3Q/view?usp=sharing)
Both the direct impacts of the Project, as well as the cumulative conditions and Project contributions to them, are addressed within the EIR sections for traffic, air quality, and greenhouse gas emissions (Subchapters 2.2, 2.6, and 2.7, respectively). Following public review of the EIR, additional confirmatory review was undertaken for GHG, and the discussion was recirculated in February to April, 2018. As discussed in the EIR, significant cumulative impacts were not identified for air quality, and appropriate mitigation has been identified for significant impacts to greenhouse gases and transportation/traffic. With mitigation, impacts remain less than significant, as disclosed in the DEIR.

The County respectfully disagrees that the Project is a considerable distance from job centers. The Project is sited between the cities of Escondido and San Marcos. It is therefore located within the north coast developed area, and in proximity to all jobs accessed from Interstate 15 (I-15), State Route 78 and Interstate 5. Specific to the immediate area, it is within 1 mile of an industrial/commercial, employment, and services locus (the Escondido Research and Technology Center) and close to “big box” uses and other job/commercial opportunities located at Valley Parkway and I-15 and along Auto Park Way. It also is in proximity to two transit centers: Nordahl Road and the Escondido Transit Center. Specific to vehicle miles traveled (VMT), please note that as described in Subchapter 2.7, Greenhouse Gas Emissions, of the EIR, the San Diego Association of Governments’ (SANDAG’s) regional assumed average trip length is 7.9 miles. The Project was modeled by the Project traffic engineers (Linscott, Law & Greenspan) as being slightly lower, at 7.88 miles for an average trip length, and therefore is consistent with the SANDAG regional assumed average trip length. Please see Appendix C of the Project Greenhouse Gas Analyses Report (Appendix J to the EIR) for details.

The current CEQA requirements use Level of Service (LOS) to determine transportation-related impacts from a project. The adoption of Senate Bill (SB) 743 into CEQA is still in the draft stage and therefore the County of San Diego has yet to adopt a methodology for evaluating significant impacts using Vehicle Miles Traveled (VMT). The technical report and the EIR appropriately

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**Response to Comment O7-6**

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<td>use adopted thresholds, but as noted above, the Project is expected to fall slightly under the established VMT total mileage.</td>
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Costs per se are not CEQA issues, and do not need to be addressed in an EIR. Please note, however, that in terms of related environmental effects, the Project either is adjacent to those facilities and/or would develop any needed facilities, as part of Project Design/Conditions. These issues are addressed, together with any Project Design Features or required mitigation, in FEIR Subchapter 2.2, *Transportation/Traffic*, and Sections 3.1.9, *Recreation*, and 3.1.10, *Utilities and Service Systems*, respectively, in the EIR. Similarly, routine developer impact fees would defray costs associated with any needs relative to schools (see Section 3.1.8, *Public Services*, in the EIR). Service Availability Forms have been provided, as appropriate, in Appendix O of the EIR for water, sewer, and schools.

**Response to Comment O7-7**

The County of San Diego Mobility Element has classified roadways within the study area to be built to certain specifications to meet the goals of the adopted General Plan Land Use plan. The roadway infrastructure improvements proposed by the Project are consistent with the adopted Mobility Element. This is also true for City of Escondido roadways where mitigation is proposed consistent with the City’s General Plan Mobility Element.

The draft SB 743 VMT guidelines are interpreted to confirm that enhancements to the circulation system consistent with a lead agency’s adopted plan (including land use) would not result in significance project impacts.
This comment is concerned with issues regarding agricultural resources, which have been addressed in EIR Section 3.2.1, *Agricultural Resources*, where impacts were determined to be less than significant due to lack of on-site water, generally poor identified soil quality, and lack of recent history of agricultural production. Additionally, biological resources are addressed in Subchapter 2.3, *Biological Resources*, where impacts to wildlife and habitat were identified and the proposed mitigation measures would reduce all impacts to biological resources to less than significant levels (EIR pg. 2.3-63). Please see the Global Response to Project Consistency with General Plan Policy LU-1.4 for reasons the County disagrees that the project would be considered sprawl.

**Response to Comment O7-9**
Please see the Global Response to Project Consistency with General Plan Policy LU-1.4 for reasons the County disagrees that the Project would be considered sprawl.
**Response to Comment O7-10**

Please see Response to Comment O7-9. The comparison to Lilac Hills Ranch is noted; however, the County disagrees the same circumstances apply to both projects. HGV South would extend and support an existing village; please see the Global Response to Project Consistency with General Plan Policy LU-1.4. Lilac Hills Ranch is not adjacent to an existing village—it would be a wholly new village. That Project’s parcels contain active farm lands and is currently zoned for agriculture. Lilac Hills Ranch proposes over 1,700 homes, as well as three commercial areas and a school. It is also not located in immediate proximity to existing commercial, medical, and other amenities provided by Escondido and San Marcos. The comparison does not apply to the analysis in the EIR; therefore, no further response is required.

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**Comment Letter O7**

this need. The Harmony Grove Village South Project represents a past of destructive sprawl development that cannot continue if San Diego County is going to be truly sustainable and meet the needs of the present without compromising the ability of future generations to meet their own needs.

Harmony Grove South is indeed a developer fantasy that will undermine the ability of future generations to meet the challenge of sustainability. In this regard Harmony Grove South is reminiscent of a similar unsustainable proposal called Lilac Hills Ranch. Like this project, Lilac Hills Ranch promoted a similar rationale for meeting the housing need on agricultural land. County voters rejected this falsehood and soundly defeated Measure B. County officials should follow the people and also reject this DEIR as inadequate and call for a recirculated DEIR with a reasonable range of alternatives including a new project location within appropriately zoned lands in the urban core.

Sincerely,

Duncan McFetridge

Director, CNFF
President, SOFAR