

COMMENTS	RESPONSES
<div style="text-align: center;">  <p>20223 Elfin Forest Road Elfin Forest, CA 92029</p> <p>Ms. Ashley Smith Land Use & Environmental Planner Planning & Development Services 5510 Overland Avenue, Suite 310 San Diego, CA 92123</p> <p>E-Mail: Ashley.Smith2@sdcoventy.ca.gov</p> <p>Re: Harmony Grove Village South Draft Environmental Impact Report (PDS2015-GPA-15-002; PDS2015-SP-15-002; PDS2015-TM-5600; PDS2015-REZ-15-003; PDS2015-MUP-15-008; PDS2015-ER-15-08-006.)</p> <p>Dear Ashley:</p> <p>Thank you for the opportunity to comment on the DEIR for this General Plan Amendment. This letter supplements that sent by our law firm, Shute, Mihaly and Weinberger, as well as the spreadsheet submitted as "HGVS DEIR comments pdf."</p> <p>The Elfin Forest Harmony Grove Town Council finds that the DEIR fails to disclose and mitigate for the impacts of breaking the compromise agreement embedded in the General Plan, impacts which may reverberate county-wide as communities learn that their elected officials may not be trusted to uphold carefully crafted plans, should this amendment be approved. The result might be a lack of willingness to compromise on future collaborative efforts, and should be analyzed in the DEIR.</p> <p>There are excellent reasons why the General Plan in its wisdom only allowed 25 units originally on these 110 acres, and the most compelling is public safety, something we expect decision makers to prioritize over all other concerns and potential inducements. Granting exemptions to the secondary egress and maximum dead-end road requirements from the Fire Code, at the same time as the DEIR cites the shortfall in funding for the local fire station as a benefit of the project, only raises questions about the integrity of the process.</p> <p>On a weekend where we saw over 60 people burned alive in their cars as they tried to evacuate from a wildfire in Portugal, in terrain and climatic conditions eerily reminiscent of Harmony Grove, it is with a somber mood and a full appreciation of what is at stake for our residents that we write these comments.</p> </div> <div style="text-align: center; margin-top: 20px;"> <p>Comment Letter O6</p> <p>2017 Board Members Jacqueline Arisada-Berjano, Chair JP Theberge, Vice Chair Jan Denny, Secretary Nancy Goodrich, Treasurer Eric Anderson Jan Dunner Angela Hartman Scott Scherlock</p> <p>June 20, 2016</p> </div> <div style="position: absolute; right: 0; top: 50%; transform: translateY(-50%); font-size: 2em;"> <p>O6-1</p> <p>O6-2</p> <p>O6-3</p> </div>	<p>Response to Comment O6-1 These are introductory comments that identify the commenter. The comments are not at variance with the EIR and do not require a response.</p> <p>Response to Comment O6-2 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 page 1-15:</p> <p style="text-align: center;"><i>The General Plan is intended to be a dynamic document and must be periodically updated to respond to changing community needs.</i></p> <p style="text-align: center;"><i>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.</i></p> <p>Please also see the Global Response to Project Consistency with General Plan Policy LU-1.4 for a full discussion relevant to this issue.</p> <p>Response to Comment O6-3 The comments regarding fires in Portugal are acknowledged. These comments do not address the environmental analysis or adequacy of the EIR and therefore a response is not required.</p>

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<p style="text-align: center;">Comment Letter O6</p> <p>Simply put, the County cannot allow more density to be built at the Wildland Urban Interface, in violation of the GP policies designed to protect public safety, beyond <i>the number of residents that can be safely evacuated on the existing road infrastructure</i>. The extensive analysis below demonstrates that this area, given the 2-lane road infrastructure, cannot accommodate another GPA beyond the already approved Harmony Grove Village. As such we request the County conduct a full analysis of the actual evacuation conditions, in a worst case scenario, similar to what we provided in Exhibit A, so that the full impact on public safety is properly disclosed. Anything short of verifying and validating the numbers in Exhibit A is robbing the decision makers and the public of the ability to make informed decisions.</p> <p>BROKEN AGREEMENTS</p> <p>The DEIR fails to acknowledge the historical context of this request for an Amendment to the General Plan. In order for decision-makers and the public to fully understand the impact of the project, it is important to add the context of its genesis, and the revised document needs to truthfully explain the setting for this request to amend the General Plan.</p> <p>Our community, starting in the early 2000's, worked proactively with County staff to come up with a sustainable, carefully crafted plan for our area that took into account our community's needs, but also balanced it against the need of the County to accommodate growth. In the plan that eventually resulted, after five years of onsite visioning workshops led by County staff and many hours of other community meetings, we agreed to compromise with the County to allow increased density in our area that more than doubled our population while still protecting the rural environment we cherish. The evidence of this good faith, collaborative effort, is found in the County presentation documents that are uploaded to the Dropbox location referenced in the</p> <p>This compromise was made with the understanding, embedded in the General Plan, that, in exchange for agreeing to more houses within a village boundary, our area would be protected from further density, through a series of down-zones of properties throughout Harmony Grove.</p> <p style="text-align: center;"><i>"In the compromise process, we agreed to downzone our own properties to protect the community for years to come. It would be a massive breach of public trust and a violation of our own property rights to turn around and upzone the property in question."</i></p> <p>Our residents gave up opportunities to subdivide and profit from smaller parcel sizes in order to protect their way of life. In effect we agreed to a development (Harmony Grove Village) to save our valley from further encroachment <i>while limiting our own profit potential</i>. This agreement is embodied in our Community Plan, in the General Plan map and is documented, for example, in the Property Specific Requests staff report about this project (Exhibit B – SD7) where county staff writes: <i>"This Village boundary is the result of several public workshops that developed a compromise position to assign additional density within the Village boundary surrounded by Semi-Rural and Rural Lands."</i> We were given assurances by County staff and our supervisors that we would not have to take on any more growth. We did our part, accepted a lot of growth, downzoned many of our own properties, foregoing financial gain for preserving community</p> <p style="text-align: center;">2</p>	<p>Response to Comment O6-4</p> <p>The comments regarding evacuation current and post-Harmony Grove Village South (HGV South) Project conditions are noted. Exhibit A evacuation calculations (attached to your letter) have been reviewed. The Project's Fire Protection Plan (FPP) discusses evacuations, the Project's approach to minimizing evacuation impacts, and conducted evacuation traffic analysis under a worst-case condition in several sub-sections of EIR Section 5.2.1.2. Please also see the Global Response to Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment O6-5</p> <p>The comments regarding the General Plan Update process are noted; however, the comments do not address the environmental analysis or the adequacy of the EIR and therefore a response is not required. Relative to Project conformance with current planning policy, please see the Global Response to Project Consistency with General Plan Policy LU-1.4 for a full discussion relevant to this issue.</p>

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<p style="text-align: right;">Comment Letter O6</p> <p>character, and now we ask the decision makers to honor this agreement. This is a matter of public trust.</p> <p><i>During my tenure on the Board of Supervisors, the community of Elfin Forest/Harmony Grove worked in good faith with the County to preserve their little community. The community wisely compromised with the County and took its fair share of growth by accepting Harmony Grove Village while down-zoning their own properties and limiting their own profit potential. They did this to protect the community from being overwhelmed by unfettered development and destroying their way of life. It would be unconscionable for the County to renege on this agreement to benefit any developer, much less out of town and out state concerns.”</i> June 2017, Pam Slater-Price, former Supervisor, County of San Diego</p> <p>Given the context, the applicant needs to justify why the County should renege on its compact with our community. What is the specific public interest served by asking for an amendment that rewrites our Community Plan and portions of the General Plan? A generic statement about lack of affordable housing in San Diego is not sufficient to permit full evaluation of the merits of the application. The General Plan has provisions for 72,000 pre-approved housing units that could be built without a GPA. How many HGVS proposed units would be “affordable”? What mechanism would be employed to ensure they stay that way? What has changed on the ground since August 2011 that makes this particular location one where the public benefit of creating more housing units exceeds the public harm of decreasing public safety by placing residents in harm’s way? The DEIR is silent on these topics.</p> <p>This is especially important in light of the fact that according to the San Diego County General Plan, any change requiring a GPA “should be reviewed to ensure that the change is in the public interest and would not be detrimental to public health, safety, and welfare.”</p> <p>In fact this request for an exception to numerous GP policies would be extremely detrimental to public safety, in that it renders evacuation in an emergency practically impossible to conduct in a safe manner. Please refer to Rahm Fire Report for details.</p> <p>PUBLIC HEALTH SAFETY AND WELFARE</p> <p>The DEIR Hazards and Hazardous Materials Cumulative Impact Analysis Finding of Less than Significant for Wildland Fire Hazards is Invalid and Must Be Readdressed Pursuant to a Reasonable Worst-Case Cumulative Evacuation Analysis.</p> <p>The DEIR Hazards and Hazardous Materials Cumulative Impact Analysis finding that “impacts from wildland fire hazards would be less than significant” (DEIR at 3.1.4-29) is invalid because it is not supported by objective evidence regarding the cumulative time to evacuate all the way to safety all residents and animals from the affected area, which includes Harmony Grove, Eden Valley, Hidden Hills and Elfin Forest, and is unreasonable because an analysis of cumulative</p> <p>3</p>	<p>Response to Comment O6-6 Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. Please also see the Global Response to Project Consistency with General Plan Policy LU-1.4 for a full discussion relevant to this issue. The Project is not requesting an exception from the General Plan.</p> <p>Response to Comment O6-7 The County Fire Authority and Rancho Santa Fe Fire Protection District (RSFFPD) have thoroughly reviewed and provided input to the Project’s Fire Protection Plan (FPP) and based on the fire protection designs and measures integrated into the Project, disagree that the Project presents a fire risk or would impede evacuations of existing communities. The inclusion of a quote from a former assistant fire chief from Colorado is noted; however, the comment does not address the adequacy of the EIR. Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>The County disagrees with the comment that the Project is inconsistent with Policy LU-6.10. Policy LU-6.10 provides that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. The policy does not per se prohibit development in areas designated as a Very High Fire Hazard Severity Zone, as exemplified by the location of the Harmony Grove Village adjacent to the Project site. As explained in the Safety Element of the General Plan, because most of the unincorporated County is located within very high or extreme fire threat areas, avoiding high threat areas is not possible (General Plan Figure S-1 [Fire Threat]). Therefore, policies focus on minimizing the impact of wildfires through land use planning techniques and other mitigation measures (General Plan, Safety Element, page 7-5). As such, Policy LU-6.10 requires that development be located and designed to protect property and residents protected from risks such as fire. Development on the Project site has been located so as to provide substantial fuel management zones and minimize the risk of structural loss and life safety resulting from wildland fires consistent with Policy LU-6.10.</p>

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Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.”</p> <p>Violation of GP LU-6.10 would occur because the designed density of the Proposed Project would substantially increase risk to property and residents in the affected area including Harmony Grove, Eden Valley, Hidden Hills and Elfin Forest due to the increased wildfire cumulative evacuation and entrapment risk caused by the density of the development exceeding safe limits, as empirically exhibited in the analysis presented below. In addition adding upwards of 1,500 new residents at the Wildland Urban Interface increases fire ignition risk as studies have shown that 90% of wildfires are caused by human activity.</p> <p>Land use policy has a key role to play in protecting populations in high fire risk areas. Per Don Whitemore, a former assistant fire chief in Colorado who has studied wildfire behavior and is quoted by the New York Times in the context of the Portugal tragedy, “wildfires are a social problem, not an environmental problem. Placing high density development in the Wildland Urban interface exponentially increases the level of risk to both populations and to firefighters”.</p> <p>“S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.”</p> <p>Country Club Drive would be the only safe egress for evacuation as per the Wildland Risk Analysis (14-15), a critical site-specific constraint in the high wildfire risk area which requires the County to minimize the population exposed to the hazard caused by the constraint as per General Plan Policy S-1.1. The Project as designed would exceed the current land use designations and density allowances for the site, resulting in a significant cumulative evacuation impact, as shown in the analysis described below, and, as evidenced by the impact, does not reflect the site specific evacuation egress constraints and hazards to property and residents posed by the consequent entrapment risk, exacerbating rather than minimizing exposure to hazards in violation of Policy S-1.1.</p> <p>“S-2.6 Effective Emergency Evacuation Programs. Develop, implement, and maintain an effective evacuation program for areas of risk in the event of a natural disaster.”</p> <p>The Project site is in a proven area of high risk and the significant cumulative evacuation impact of the Project as described below would preclude development, implementation and maintenance of an effective evacuation program thereby causing the County to violate S-2.6 if the GPA is</p> <p style="text-align: center;">4</p>	<p>Response to Comment O6-8 Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>The courts have consistently held that a project need not be a perfect match with each and every policy, but needs only to be consistent overall with the General Plan (Friends of Lagoon Valley v. City of Vacaville [2007] 154 Cal.App.4th 807, 817; see also Sequoyah Hills Homeowners Assn. v. City of Oakland [1993] 23 Cal.App.4th 704, 719, 29 Cal.Rptr.2d 182, where consistency is defined as “compatibility” and not strict adherence to every policy in the general plan). This means that the Project must be viewed in conjunction with the overall General Plan. Policies such as LU-6.10 and 6.11 would mean that development could be located on the Project site so as to minimize the risk of structural loss and life safety resulting from wildland fires and a project will not be developed where hazards cannot be mitigated. As explained in the Safety Element of the General Plan, because most of the unincorporated County is located within very high or extreme fire threat areas, avoiding high threat areas is not possible (General Plan Figure S-1 [Fire Threat]). Therefore, policies focus on minimizing the impact of wildfires through land use planning techniques and other mitigation measures. (General Plan, Safety Element, page 7-5.)</p> <p>Response to Comment O6-9 Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p>

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<p style="text-align: center;">Comment Letter O6</p> <p>Forecast Fire Progression map (PDS2015-GPA-15-002-WUIFERP_v3.pdf at 6) and (2) in the Double Peak/San Elijo Hills area cutting off egress access to San Elijo Road/Twin Oaks Valley Road, as could occur by arson and/or in a fire siege as occurred in 2014.</p> <p>In this case, Country Club Drive would be the only safe egress as per the Wildfire Risk Analysis (14-15) for evacuating existing plus zoned potential plus cumulative project total of more than 2,500 homes based on a reasonable estimate of residences as well as human and animal populations in the area derived from immediately available sources (i.e., combined existing and zoned potential residences in Elfin Forest, Harmony Grove, Eden Valley and Hidden Hills, existing and proposed residences in HGV, and proposed residences in the Valiano project and HGVS).</p> <p>Using the FPP methodology which assumes as a reasonable worst-case, each of the residences have three vehicles, and without accounting for additional relevant variables such as animal evacuation and evacuee prep time, there would be over 7,500 vehicles evacuating the area. Given the vehicular capacity of 1,500 on Country Club Drive between Mt Whitney Road and Hill Valley Drive, as per the Highway Capacity Manual 2010, adapted to the conditions of Country Club Drive by MRO Engineers, it could take as long as four to six hours to evacuate all of the residents. This would constitute a significant impact that has not been disclosed, analyzed or evaluated in the DEIR.</p> <p>A revised DEIR must include this analysis accounting for all automotive and horse trailer vehicle trips required to evacuate the human and animal population of the entire affected area under existing, existing plus zoned potential, and potential by GPA densities -- a), b) and c) scenarios as defined above --, disclosing and analyzing all of the following factors in order to provide the public and decision-makers with enough information to disclose full potential impacts:</p> <ul style="list-style-type: none"> • Number of "legacy" currently existing homes in Harmony Grove, Eden Valley, Hidden Hills, and Elfin Forest, which may all be evacuating on the single route the WUI Emergency Evacuation Plan deemed to be safe, Country Club Drive; • Potential number of residences in the same communities yet to be built per current zoning, so as to reasonably anticipate worst case scenario at build-out; • Potential number of residences in the proposed GPAs, Valiano and HGVS; • Number of large animals (horses, alpacas, cattle) and others unlikely to fit in a regular vehicle (goats, pigs, chicken and the like) to evacuate in the community of interest; • Available on-site trailers or other means of evacuating such animals; • Estimate of how many incoming trailers would need to be coming into those communities to retrieve those animals beyond the on-site trailering capacity; • Estimate of how many emergency vehicles and apparatus might be using the same road. <p>Further, to provide a basis for evaluation of Project compliance with General Plan policies LU-6.10, S-1.1, S-2.6, S-3.5 and S-3.6, the analysis should account for the maximum time that Country Club Drive would be a safe mass evacuation route under the worst-case cited above, and determine the maximum safe residential density and population level in the affected area based on this evacuation time limit. For example, the map cited above from the DEIR shows fire reaching Country Club Drive north of the Proposed Project in four hours. Certainly, the maximum time window for mass egress would be no more than four hours and may be substantially less considering smoke and branding hazards and the risk of stranding motorists in the path of the fire as we just saw happening in Portugal on June 18th.</p> <p style="text-align: center;">6</p>	<p>Response to Comment O6-13</p> <p>As detailed in the Project's FPP (Section 5.2.1.2, <i>Access and Parking</i>), it has been demonstrated that the Project's proposed unit count and corresponding population can be safely evacuated from the area within a shorter time frame than four hours and has contingency options available should a wildfire ignite closer to the Project, reducing the time available for evacuation or compromising one or more of the four available evacuation routes. The comments regarding fires in Portugal are acknowledged. These comments do not address the environmental analysis or adequacy of the EIR and therefore an additional response is not required. Relative to evacuation of the larger valley, please refer to Global Response Adequacy of Emergency Evacuation and Access.</p>

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Using three hours for illustrative purposes as a maximum safe evacuation route time limit for mass egress, and 45 minutes evacuee preparation time, the approximate time to evacuate the human plus animal population based on reasonable residence and population estimates is as follows (based on the calculations from tables in Exhibit A):</p> <p>Existing = About 2 ½ hours, ½ hours less than the safe evacuation time limit</p> <p>Existing + Zoned Potential = Almost 5 hours, 2 hours more than the safe evacuation time limit</p> <p>Existing + Zoned Potential + Potential by GPA = About 6 ½ hours, 3½ hours more than the safe evacuation time limit</p> <p>Clearly, whether based on the simpler analysis excluding prep time and animal evacuation data or the more detailed analysis inclusive of those variables, the cumulative impact of HGVS to wildland fire hazards would be significant, the DEIR finding of insignificant impact is invalid, and the Project design density is out of compliance with General Plan policies LU-6.10, S-1.1, S-2.6, S-3.5 and S-3.6.</p> <p>The above analysis is based on the Fire Protection Plan vehicle volume methodology using a reasonable estimate of existing and potential residences, human and animal populations in the affected communities, and with the estimate of the maximum hourly vehicle capacity of Country Club Drive between Mt. Whitney Road and Hill Valley Drive provided by MRO Engineers based on the Highway Capacity Manual, 2010 adapted to the conditions of Country Club Drive.</p> <p>In order to provide the basis for a more definitive analysis of the cumulative wildland fire evacuation hazards in the affected area for the general benefit of the community, planners and decision makers as well as to substantiate evaluation of Project impacts and compliance with General Plan policies LU-6.10, S-1.1, S-2.6, S-3.5 and S-3.6, the County should conduct a thorough survey of County records to determine the officially documented number and type of existing residences and zoned potential residences in Harmony Grove, Eden Valley, Hidden Hills and Elfin Forest, the affected communities that would rely on safe evacuation egress on Country Club Drive to Auto Park Way under the worst-case scenario. The County should also conduct a survey of the existing and zoned potential animal population in each of these affected area communities, particularly horses and livestock, which are subject to evacuation and will add to the number of vehicles, i.e. horse trailers, both coming and going, to include in the evacuation time calculation. The animal population survey should include a survey of horses boarded by non-residents and the trucks and horse trailers of the boarders should be added to the number of inbound and outbound vehicles in the calculation. These data points combined with the number of residences, human and animal populations projected for the Harmony Grove Village South and Valiano projects will provide the County with a sound basis for calculation of the estimated cumulative time required for mass evacuation of the entire affected area under a reasonable worst case scenario using only Country Club Drive to safety beyond the Auto Parkway intersection.</p> <p>The DEIR completely fails to disclose any of the data points cited above as the basis for sound decision making.</p> <p style="text-align: center;">7</p>	<p>Response to Comment O6-14</p> <p>Please see the Global Response to Adequacy of Emergency Evacuation and Access. Also, it should be noted that HGV South resident preparation time was included within the time estimates provided in the Project’s FPP.</p> <p>Response to Comment O6-15</p> <p>The County disagrees that the cumulative impact of HGV South to wildland fire hazards would be significant and that the EIR finding of insignificant is invalid. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. With respect to the requested survey, please see discussion under the heading “Speculative Simulations Regarding Various Evacuation Scenarios are not Required by CEQA” in Chapter 8.0, Section 8.3.4.4, of this FEIR.</p> <p>Large animal evacuations are an integral component of the Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (EOP 2014). Department of Animal Services and the San Diego Humane Society are both participating agencies that during an emergency. Per the Evacuation Annex of this document:</p> <p style="text-align: center;"><i>The San Diego County Department of Animal Services (DAS) has plans in place to transport and shelter pets in a disaster under Annex O of the OA EOP, including the Animal Control Mutual Aid Agreement. Animal Control Officers, the San Diego Humane Society, and private animal care shelters will assist in the rescue, transport, and sheltering of small and large animals. In addition, potential volunteer resources and private groups should be identified and tracked in WebEOC. Only non-emergency resources and personnel, such as public and private animal services agencies, will be used to rescue and transport animals during an evacuation effort. In most cases, DAS and the OA EOC will coordinate and attempt to collocate animal shelters with people shelters.</i></p> <p>Short-timeframe wildfires may require an alternative approach and that approach requires animal owners in rural areas to plan for these events and</p>

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	<p>create contingencies when evacuation may not be possible. This applies with or without development of larger communities.</p> <p>A Wildfire Evacuation Plan has been prepared for implementation by the HOA prior to occupation of the site's structures. The Wildfire Evacuation Plan includes easy-to follow maps and instructions for residents to prepare their own "Ready, Set, Go!" action plans and preparing for pets and animals (FPP, page 37), although there will not be livestock allowed in the Project so there would be no additional animal trailers associated with the Project.</p> <p>Response to Comment O6-16</p> <p>The County disagrees with your comment that the EIR provides no basis for sound decision making. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access for discussion of the Project's analysis, conclusions, and evacuation approach and determination of significance.</p>

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<p style="text-align: center;">Comment Letter O6</p> <p>The County should also verify the hourly vehicle carrying capacity of Country Club Drive between Mt. Whitney Road and Hill Valley Drive based on the Highway Capacity Manual, 2010 as adapted to the conditions of the roadway, and determine the safe evacuation route use time window for the roadway based on the Harmony Grove-Offshore Forecast Fire Progression map referenced above. Once the County has obtained these data points, an analysis should be performed to determine the cumulative evacuation time for existing, potential zoned and potential by GPA densities, then compare these findings to the safe evacuation route time period as a basis for substantiation of a cumulative wildland fire project impact significance finding.</p> <p>Further, calculating the <i>maximum safe density limit</i> for the area which will allow for safe evacuation ingress and egress for the entire existing and zoned potential population of humans and animals in a worst-case wildfire scenario should be determined by such detailed analysis, and that density limit should be used as a basis of evaluation for the HGVS project and all projects in the area to ensure development density is “designed to protect property and residents from the risk of natural and man-induced hazards”, including the property and residents of affected neighboring communities, in compliance with General Plan Policy LU-6.10 as well as to ensure compliance with Safety Element policies S-1.1, S-2.6, S-3.5 and S-3.6.</p> <p>Failure to conduct such an analysis, or performance of the analysis using inaccurate data, or on the basis of an inferior worst-case scenario, would represent a failure of the County to exercise fundamental best practice disaster planning and, consequently, failure to properly provide for the safety of residents and failure to “ensure that development accounts for physical constraints and the natural hazards of the land” in violation of General Plan Guiding Principle 5.</p> <p>A CPEP or CWPP Committee Should be Established for the Project Area at the Direction of the County to Develop and Implement Effective Wildfire Hazard Mitigation Measures.</p> <p>As a proven effective measure to mitigate evacuation and other wildfire risks, the County should direct the San Dieguito community, which is primarily served by the Rancho Santa Fe Fire Protection District, to form a committee of public officials and local citizens to develop a community-wide Community Protection and Evacuation Plan (CPEP), or Community Wildfire Protection Plan (CWPP), in compliance with the Board of Supervisors resolution of January 2003.</p> <p>A CWPP has been developed for the Rancho Santa Fe portion of the San Dieguito community, and the Rancho Santa Fe Fire Safe Council which developed the CWPP for Rancho Santa Fe could serve as a basis for an extended committee which should include local citizens and other interested public agency representation from other parts of the San Dieguito community not currently members of the Rancho Santa Fe CWPP committee. The establishment of such a committee would provide the forum and organizational structure to evaluate evacuation risks in the area affected by the Proposed Project, leveraging considerable local knowledge and experience with many area wildfires, to develop an effective mitigation strategy for evacuation and other wildfire risks. The findings and mitigation strategy developed by the committee should then be used to provide a bona fide foundation for Project impact and General Plan policy compliance evaluation, findings and mitigation.</p> <p>The County Should Engage Federal Assistance to Ensure Best Practice Evacuation Risk Evaluation</p> <p style="text-align: center;">8</p>	<p>Response to Comment O6-17</p> <p>The comment regarding additional calculations regarding evacuations is noted. However, the Project’s EIR and technical reports have been prepared to County and RSFFPD standards and meet the analysis requirements for determining whether significant impacts are associated with development of HGV South. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. With respect to the comment regarding HCM 2010 data, please refer to Response to Comment O3b-9, and addenda in the Final Traffic Impact Analysis.</p> <p>Response to Comment O6-18</p> <p>The comment regarding establishment of a community protection and evacuation plan (CPEP) or community wildfire protection plan (CWPP) is noted. While this comment does not address the adequacy of the EIR, the following response is provided. These emergency pre-planning documents are beneficial planning tools that can help assess and prioritize hazard areas for treatment, support applications for grant funding to implement hazard reduction, and provide basic recommended actions for before, during and following emergencies, including wildfires. These documents are typically coordinated by a non-profit organization, particularly, a Fire Safe Council (FSC). There are existing FSCs in Rancho Santa Fe and Escondido, and it would be recommended that Elfin Forest Harmony Grove Town Council contact the San Diego County Fire Safe Council (http://firesafesdcounty.org/fsc-support/start-a-local-fsc/) to inquire about setting up a community protection and evacuation plan (CPEP) or community wildfire protection plan (CWPP). The FSC then would be able to coordinate and reach out to collaborating agencies for preparation of one or both of the emergency planning documents mentioned. CPEPs and CWPPs are not used for Project-level impact and General Plan policy compliance analysis. These documents focus on existing conditions and how to reduce hazardous areas, plan for emergencies, and raise citizen awareness to appropriate responses to the types of hazards that exist in the vicinity of their homes.</p>

COMMENTS	RESPONSES
	<p>Response to Comment O6-19 The comment is noted. Please see Response to Comment O6-18 regarding preparation of CPEPs and CWPPs. Please see the Global Response to Adequacy of Emergency Evacuation and Access.</p>

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter O6</p> <p>As a further evacuation risk mitigation measure, the County should engage The National Academies of Sciences Engineering Medicine Transportation Research Board Standing Committee on Emergency Evacuation https://www.mytrb.org/CommitteeDetails.aspx?cmid=4394 to perform an expert analysis of the evacuation risk and propose mitigation. With a national perspective on mass evacuation, the expertise, tools and resources of a federal agency, the NASEM TRB emergency evacuation committee would be in a position to perform a top level situational evaluation and potentially identify new mitigation measures based on their expertise. The results of their analysis should then be evaluated by the San Dieguito CWPP committee and be considered in the development of the community-wide CWPP and to provide additional substantiation for Project impact and General Plan policy compliance evaluation, findings and mitigation.</p> <p>Without these broader efforts to thoughtfully and carefully plan for housing outside the General Plan envelope, the public and the decision-makers do not have the information necessary to properly evaluate the real potential impacts of the proposed deviation from the General Plan.</p> <p>Fire concerns - exceeding dead end road requirement and no secondary egress</p> <p>In the DEIR, the Fire Protection Plan waives a key requirement intended to protect the safety of residents, both existing and new residents. The most egregious of these is a waiver of the 800 foot minimum dead end road requirement (503.1.3). The only mitigation acceptable for exceeding this requirement is providing secondary access (503.1.2). The FPP waives both the requirement and yet does not provide mitigation that would similarly allow for safe evacuation. Those of us who live on Country Club Road who watched 30+ houses burn and the oldest religious community in San Diego County destroyed during the Cocos fire are very concerned about the evacuation issues and the unsafe situation this proposed exception creates. The FPP states that there <i>is</i> a private road that could provide secondary egress should the main egress be blocked. However, this unimproved dirt road belongs to private landowners who have not given permission (nor been asked) for this use and furthermore, is unsuitable for emergency vehicle access and unlikely to support this many passenger vehicles and horse trailers exiting the area. Additionally, it goes through brush and other flammable habitat which makes it less suitable for evacuation during a wildfire event. Please provide evidence that a) there is a permission/easement to use this road, b) it is not obstructed and in fact, passable by vehicles, c) that it can safely accommodate 1800+ vehicles and horse trailers in a timely manner and d) that in the case that Country Club Road is blocked due to bridge failure, fire or other obstructions, residents would be able to evacuate safely and fire apparatus would be able to access the site.</p> <p>The FPP states that Country Club Dr. south of Harmony Grove Road will be widened to 3 lanes to increase the throughput during evacuation (1900 cars per hour / per lane). What it fails to mention is that this is only 1400 feet of road that will be improved and, upon crossing HGR, the traffic is funneled back to 2 lane roads (Country Club going North or HG Road in either direction) which will create a massive bottleneck. Only one of those roads (Country Club Dr.) will be available to evacuate per the HGVS Wildfire Risk Analysis conducted by Rohde and Associates on behalf of the applicant, so they cannot make an assumption that traffic will split into all directions at that intersection. During a fire event there will be only one evacuation route as one route will always be blocked due to the fire. During the Cocos Fire <i>both</i> HG Road and</p> <p>9</p>	<p>Response to Comment O6-20</p> <p>The FPP does not “waive” the applicable dead-end road length code provision but rather was granted a modification, as allowed by the Fire Code. The FPP requires findings (site specific characteristics, provided fire safety features above and beyond the code, and measures directly meeting the intent of the code) to be made in order to receive a modification. The comment regarding secondary access being the only mitigation for dead end road length is incorrect. Please see the Global Response to Fire Hazards Impact Analysis.</p> <p>The feasibility of secondary access to the north, south, east and west of the Project site was analyzed with both County staff and RSFFPD input. However secondary access routes have proven infeasible based upon this evaluation (FPP Appendix C), which included an evaluation of eight alternatives for secondary access. Option 4, which would require improving a privately owned off-site road that connects with Johnston Road and eventually intersects with Citracado Parkway to the east of the HGV South Project, was determined to be the option with the least physical challenges. The FPP does not state that Johnston Road would be relied upon to evacuate residents during a wildfire emergency. The comment regarding Johnston Road’s current condition is noted. The condition of the road was evaluated by SDCFA, RSFFPD, the Project’s Fire Consultants, and independent fire pre-planning consultants for its potential to be used as secondary access. The result of that analysis indicated that even if access easements could be obtained, improvements to Johnston Road would result in a useable access way, but that would not strictly conform to the County’s roadway standards and a modification/variance would need to be granted.</p> <p>Response to Comment O6-21</p> <p>The comment presents conclusions from the Wildfire Risk Analysis (Rohde & Associates 2016) out of context and then utilizes them to suggest that there is only one possible evacuation route available in the Harmony Grove area, Country Club Drive, and that even it is not safe. In fact, the Rohde & Associates Report indicates that there are four potential evacuation routes north of Escondido Creek available for ingress/egress from the Project during evacuations. The conclusion of that report’s analysis was (see Page 15):</p>

COMMENTS	RESPONSES
	<p data-bbox="1188 168 1877 363"><i>In contrast, the consultant staff and public safety officials who participated in the field tour of the site unanimously agreed that the site has 4 [sic] potential routes of egress during evacuation, two with strong viability. All participants expressed comfort that the proposed variance for the 800-foot single access road was acceptable.</i></p> <p data-bbox="1075 396 1990 461">Please also see the Global Response to Adequacy of Emergency Evacuation and Access.</p>

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter O6</p> <p>Country Club Drive were blocked as the fire spread from the San Marcos area to the Eden Valley and Harmony Grove communities.</p> <p>Fire concerns - shelter in place not compliant - and at the expense of existing residents The FPP also states that the proposed project has a "shelter-in-place" (SIP) philosophy so that its residents would be safe during a wildfire event, though not SIP "status". SIP only protects from ember ignition, not the fire front itself. Sited in a wildland urban interface (WUI) with permanent open space surrounding the project on at least two sides, the houses of HGVS are more likely to be overwhelmed by the fire front itself, not just the embers from said fire. In fact, during the Witch Fire, the fire front (not the preceding embers) caused a majority of the damage to structures (source: A case study of communities affected by the Witch and Guejito Fires, US Department of Commerce). SIP compliant construction can withstand some ignition from embers, but a fire front that can radiate heat upwards of 2000 degrees incinerates everything in its path and is simply too hot to be extinguished by shelter-in-place residents with garden hoses.</p> <p>Regardless, even if the SIP philosophy may offer some measure of protection to the new residents, it vastly increases the risk encountered by the existing residents and community that has older construction with lower fire protection ratings than the newer buildings. The increased risk is several fold:</p> <p>a) it increases the density of housing in an area of low adjacent housing density and thousands of acres of <i>permanently preserved open space</i>, which increases the sources of ignition.</p> <p><i>"In areas with a low adjacent housing density, the likelihood of fires increases rapidly with additional density (i.e., increased ignitions)"</i> Mann ML, et al. (2016) <i>Incorporating Anthropogenic Influences into Fire Probability Models: Effects of Human Activity and Climate Change on Fire Activity in California</i>. PLoS ONE 11(4): e0153589. https://doi.org/10.1371/journal.pone.0153589</p> <p><i>"Scenarios with lower housing density and larger numbers of small, isolated clusters of development, i.e., resulting from leapfrog development, were generally predicted to have the highest predicted fire risk to the largest proportion of structures in the study area."</i> Syphard AD, Bar Massada A, Butsic V, Keeley JE (2013) <i>Land Use Planning and Wildfire: Development Policies Influence Future Probability of Housing Loss</i>. PLoS ONE 8(8): e71708. doi:10.1371/journal.pone.0071708</p> <p>b) it decreases the ability for existing residents whose homes are not protected by SIP to evacuate due to increased road congestion, and</p> <p>c) the lack of secondary access in effect dooms the existing residents to being burned alive in their own homes in the very likely scenario (recently encountered during the Cocos Fire) that the main access on Country Club is obstructed by residents panicking and causing obstruction as they try to evacuate.</p> <p>Even our own Fire District states in their own documents, that secondary access in SIP communities is crucial: "It is important to have at least two ways out of your community, including secondary access routes. If all routes are congested, you would be safer in your home</p> <p>10</p>	<p>Response to Comment O6-22 The comment includes statements regarding shelter in place that are inaccurate, specifically that ignition resistant construction addresses embers only. The structures in the community have been designed to ignition resistance levels necessary for the worst-case fire scenario given the site's fuels, terrain, and extreme weather conditions. Please see the Global Response Adequacy of Emergency Evacuation and Access.</p> <p>Further, development in the area is converting much of the valley bottom fuels to ignition resistant landscapes. Fire through the valley bottom would be spotty and with an inconsistent fire front. The primary fire front will be on the slopes of valley bordering hills, where native fuels are concentrated. The Project's developed areas are on the valley bottom with developed landscapes and reduced fuels to the north and northwest. The comment's supposition that a fire front will result in 2,000-degree heat on the Project's structures is not supported by fire science or actual fire event after action assessments. Further, to clarify, there is no expectation in the FPP or its fire protection system that residents of HGVS South will be involved with fire-fighting.</p> <p>This type of development with an unbroken landscape (as opposed to low density wildland urban intermix projects) has been found to perform well against wildfires (USGS Research 2015; IBHS Mega Fires 2008, both incorporated by reference). Fire behavior has been analyzed, compared to similar fire environments, and accepted by County Fire Authority.</p> <p>While wildfires under extreme wind conditions can be unpredictable, the Project has been designed with a layered system of protections and determined to include the necessary features to perform well during wildfires.</p> <p>Response to Comment O6-23 Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>The quotations regarding anthropogenic fire increases in the comment are based on theoretical models that are limited in their ability to predict and include assumptions, some very important, that relegate the study's conclusion</p>

COMMENTS	RESPONSES
	<p>invalid for comparison with HGV South. For example, the referenced study (Mann ML, et al. 2016, incorporated by reference) quote: “In areas with a low adjacent housing density, the likelihood of fires increases rapidly with additional density (i.e., increased ignitions)” neglects to include the second half of that sentence, which reads: “but then decreases beyond some point as characteristics of the built urban environment and increased suppression effort reduce it.” The study acknowledges that development of areas (even development that is not as fire hardened as HGV South) will reduce the number of fires, dramatically, following initial development. The study is flawed with regard to comparison with HGV South in that it does not consider the fire ignition mitigating effects of fuel treatments, i.e., fuel modification zones, as stated in the Assumptions and Limitations section: “Additionally, we do not include the effects of fuel treatment, which have been shown to be effective in some ecosystems.” This is a significant study limitation that renders the study’s conclusions inapplicable to the HGV South Project.</p> <p>The second quote regarding lower housing density and larger numbers of small isolated clusters of development including the highest predicted fire risk to the largest population (Syphard and Keeley 2013, incorporated by reference) is not an appropriate example for the HGV South Project or Harmony Grove. HGV South is a continuous area that is fuel converted and fire hardened. Harmony Grove Village is also a large (larger than HGV South) area that is fuel converted and fire hardened. Existing developed properties along Country Club Drive include a high level of fuel conversion. This has a direct effect on the wildfire spread, intensity, and behavior.</p> <p>The Project will include a robust fire protection system, as detailed in the Project’s FPP. This same robust fire protection system provides protections from on-site fire spreading to off-site vegetation. Accidental fires within the landscape or structures in the Project will have limited ability to spread. The landscape throughout the Project and on its perimeter will be highly maintained and much of it irrigated, which further reduces its ignition potential. Structures will be highly ignition resistant on the exterior and the interiors will be protected with automatic sprinkler systems, which have a very high success rate for confining fires or extinguishing them. The HGV South community will</p>

COMMENTS	RESPONSES
	<p>be a fire-adapted community with a strong resident outreach program that raises fire awareness among its residents.</p> <p>Response to Comment O6-24 The County disagrees with the comment that the Project decreases the ability for existing residents to evacuate due to increased road congestion. Please see the Global Response to Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment O6-25 Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment O6-26 It is agreed that secondary access is important and that if all access routes are congested, emergency management personnel may decide it could be safer to stay in the home. Please see the Global Response Adequacy of Emergency Evacuation and Access.</p>

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter O6</p> <p>than being stuck in traffic trying to evacuate.” (https://www.rsf-fire.org/wp-content/uploads/2016/09/SIP_for_web.pdf).</p> <p>So the waiver of the key California Fire Code requirements puts existing residents (and the new ones as well) at considerable risk and increases their likelihood of property damage and risk to their personal safety. This is in violation of the County of San Diego Guidelines for Determining Significance in Wildland Fire and Fire Protection regarding modifying requirements:</p> <ul style="list-style-type: none"> • That the modification is in compliance with the intent and purpose of the code; and, • That such modification does not lessen health, life and fire safety standards. <p>Source: http://www.sandiegocounty.gov/dplw/docs/Fire-Guidelines.pdf</p> <p>Please substantiate any claims that the FPP does not put existing residents at risk, does not significantly increase the risk of wildfires and also provide studies showing how SIP will mitigate any risk to both existing or new residents not just due to ember ignition but also direct fire front exposure as was the case with recent fires in the County, as is likely due to the proximity and abundance of open space nearby. Please provide studies that show that SIP residents are likely to stay put rather than flee a fire and not create congestion on a 2-lane road such as Country Club as they seek to escape. Please provide substantiation that the clubhouse shelter being provided is enough to house all new and existing residents in the case of inability to evacuate. According to the FPP, the club house can hold 330 people, less than a fifth of the population of the proposed project and existing residents: describe what type of triage of other prioritization method will be used when panicked residents cannot evacuate and the fire front is upon them, as was the case in this very area only a few years ago.</p> <p>Fire Protection Plan and Potential Conflicts of Interest</p> <p>The FPP clearly states that the existing fire station at HGV has a funding gap and that this project will help close that gap.</p> <p><i>The approved fire station that will be built in Harmony Grove Village requires additional funding to cover annual operating costs. The HGV’s project will provide fair-share funding which will help close the financial gap that currently exists.</i></p> <p>The DEIR seems to imply that the County has an incentive to approve a project in a High Fire Severity Zone, waiving crucial fire safety regulations where houses burned only 3 years ago, in order to correct an error that the County made in the first place. Please disclose the nature, amount and structure of the “financial gap”, and how it will be filled should this project not be approved.</p> <p>LAND USE</p> <p>Rewriting of our community plan to benefit the developer without corresponding public benefit or input</p> <p>The proposed changes to the Community Plan, made without any input from the community itself, are an insult and an affront to the hundreds of hours expended by community members</p> <p>11</p>	<p>Response to Comment O6-27 Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment O6-28 Please see the Global Response to Adequacy of Emergency Evacuation and Access.</p> <p>Specifically, regarding citizen reaction during wildfires, research indicates orderly movement/direction of people is the result of planning, training, education, and awareness, all of which are promoted to varying degrees within San Diego County. Evacuation has been the standard term used for emergency movement of people and implies imminent or threatening danger. The term in this response, and under the “Ready, Set, Go!” concept that will be employed at HGV South, indicates that if there is a perceived threat to persons and movement out of the area is necessary, it will occur according to a pre-planned and practiced protocol, reducing the potential for panic.</p> <p>Citizen reactions may vary during an evacuation event, although several studies indicate that orderly movement during wildfire and other emergencies is not typically unmanageable. Evacuation and the contingency on-site sheltering can be made even less problematic through diligent public education, which will occur at HGV South, and emergency personnel training and familiarity, which occurs at the County and city levels in San Diego County. The Wildfire Evacuation Plan, discussed in Response to Comment O6-15, will be located at the HOA as well as given to homeowners. In addition, there will be yearly meetings with RSFFPD personnel that homeowners will be encouraged to attend. HGV South residents will be aware of the potential fire threat in the area, and of the preferred approach to evacuate early, well before a fire threatens the community. They will also be aware of their community’s ability to provide a contingency option of temporarily sheltering in their homes. Social science research literature indicates that reactions to warnings follow certain behavior patterns that are defined by people’s perceptions (Aguirre 1994, Drabek 1991, Fitzpatrick and Mileti 1994, Gordon 2006, Collins 2004, all incorporated by reference) and are not unpredictable.</p>

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter O6</p> <p>involved in the process of developing the community plan prior to its adoption into the San Diego County General Plan. Many residents accepted a downzoning of their own properties, forsaking their own profit potential, as part of this compromise. What is the point of developing a Community plan in good faith with County staff, if an applicant can simply delete those portions they cannot comply with rather than adhere to the policies? These changes are proposed without any input from the community to benefit solely the developer. Under section H and under LU-2.2.1, the applicant attempts three times to erase the entire premise for accepting the original HGV development, namely to balance the number of rural homes with the number of urban homes so that the rural nature of our community is not overwhelmed by urban style development. Please show how having rural residents outnumbered 4 to 1 by urban/suburban development will help maintain the rural character and voice of our community. Just stating it does not make it so.</p> <p>The population of Harmony Grove is expected to increase dramatically as the Harmony Grove Village development pattern is built out. If the <u>pattern shown on the General Plan Land-Use-Map-is-policies are strictly-closely followed, the-final-number-of-urban-homes should-approximately-equal-the-number-of-rural-homes-in-the neighboring communities of Elfin Forest, Eden Valley, and Harmony Grove should be able to keep its rural voice.</u></p> <ul style="list-style-type: none"> • <u>Urban homes must not outnumber the rural homes to maintain (The rural voice must be maintained and preserve the rural heritage of this historic community must be preserved by the Community Growth policies outlined under Issue LU-2.2.</u> <p>Policy LU-2.2.1 Ensure that <u>the-number-of-urban-residences-does-not greatly-exceed-that-of-the rural-residential-uses-and-equestrian-character-of in-the greater unincorporated communities of Harmony Grove and Eden Valley are maintained by adherence to the Community Plan policies set forth in Section 1.1 "Community Character."</u></p> <p>They also seek to strike any mention of the negotiations we had with the County in establishing these guidelines. There were many folks involved in that process including former and current members of the Board of Supervisors, former County staff and others, many of which are aware and will testify that these policies were implemented as part of a negotiation with the community, not simply adherence to existing General Plan policies. The applicant should provide proof that these policies were not a result of a negotiation with the community and also provide justification that changing these policies will not have an adverse effect on the existing communities (e.g. growth inducement, fire risk, increased traffic, reduced biological resources, community character). Otherwise, they may not strike out these references in the Community Plan.</p> <p>Supervisors. Residents will continue to work to preserve this historic 100-year-old community by implementing the Village Development Pattern <u>that—was negotiated-consistent with General Plan policies.</u></p> <p>12</p>	<p>In summary, warnings received from credible sources by people who are aware (or have been made aware) of the potential risk, have the effect of an orderly decision process that typically results in successful evacuation. This success is heightened when evacuations are practiced (Quarentelli and Dynes 1977, Lindell and Perry 2004, incorporated by reference) as is recommended within the Harmony Grove area for both the populations in higher hazard areas and for fire and law enforcement personnel. Further, in all but the rarest circumstances, evacuees will be receiving information, including their direction for residents to stay in their homes, from credible sources during a wildfire evacuation. Further, it would be anticipated that law enforcement and/or fire personnel would be on site to help direct residents, calm them, and provide updates and would be viewed by evacuees as knowledgeable and credible. Education and training regarding fire safety and evacuation events is an element of successful future evacuations.</p> <p>Lastly, the club house is not intended to house all of the HGV South’s residents. Each of the buildings on site has the ability to be used for temporary sheltering, if directed to do so. The clubhouse can be used for moving some of the site’s population from perimeter areas, if considered necessary. It can also be used as a staging area for fire operations and can be available to existing residents on Country Club Drive if that is considered the best option for their relocation.</p> <p>Response to Comment O6-29</p> <p>Contrary to the supposition in the comment, the payment to the HGV Fire Station is not being provided in exchange for an exemption from the Fire Code. Project fire standards are expected to exceed Code requirements. Rather, the payment would support adequate fire services for the Project (and, it is assumed, surrounding neighbors). The contribution to the HGV Fire Station is a routine part of development fees, similar to those paid to support police services and schools.</p> <p>As indicated through all the responses above, the Project has been analyzed by the County and RSFFPD on the merits of the proposed plan and the measures provided to mitigate the potential fire risk. The Project was not found to make fire more likely, or to result in adverse effects on evacuation. To the contrary, the presence of a fire-resistant development would be likely to shield some uses</p>

COMMENTS	RESPONSES
	<p>currently providing the development/wildland interface, and would also facilitate easier evacuation for all existing residences currently using the two-lane portion of Country Club Drive south of Escondido Creek and the narrow at-grade crossing.</p> <p>Response to Comment O6-30 Please see the Global Response to Project Consistency with General Plan Policy LU-1.4 and Global Response to General Plan/Community Plan Amendments CEQA Impact Analysis.</p>

COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter O6</p> <p>Baseline unit count needs to be reconciled</p> <p>Please reconcile how the baseline unit count of 220 was derived, since it is substantially different from the staff yield estimate if granted prior to the last entitlement of only 168-180, just prior to the Supervisors' vote on this Property Specific Request. See SD17 on staff report (Exhibit B) prior to supervisors' vote, stating (emphasis added):</p> <p>Nearly one-half of the property is constrained by steep slopes, is nearly entirely constrained by High and Very High Habitat Value, and within the Very High Fire Hazard Severity Zone. The VR2 designation is not supported by the Elfin Forest / Harmony Grove Town Council or the San Dieguito CPG. In addition, the property is outside the Harmony Grove Village boundary proposed in the San Dieguito Community Plan. <i>This Village boundary is the result of several public workshops that developed a compromise position to assign additional density within the Village boundary surrounded by Semi-Rural and Rural Lands.</i> The Harmony Grove Town Council and the San Dieguito CPG support the PCC / Staff Recommendation, which proposes a combination of SR2, SR4, and RL20 designation. Under this recommendation, the SR2 designation is applied to the area adjacent to the Harmony Grove Village where there is less steep slope. The RL20 designation is applied in the southern portion where there is the most steep slope and SR4 to the remaining areas. The applicant is requesting a compromise position of Semi-Rural 0.5, which would be the same base density, but would result in fewer units because of the slope restrictions. The following is an estimate of the potential dwelling unit yield under each of the alternatives:</p> <p style="padding-left: 40px;">Existing General Plan — 20 - 27 units PC / Staff Recommendation — 22 - 26 units Referral Map — 214 units <i>Property Owner's request (SR0.5) — 168 - 180 units</i></p> <p>Please note none of the options in front of the decision-makers included 220 units: please provide paper trail and evidence of how that calculation was derived. Since the supervisors voted in April 2011 on the basis of information showing 20% less units, please provide legal rationale that the public and decision makers were afforded full disclosure and analysis of the full project impact as approved.</p> <p>Lot sizes inconsistent with Equestrian Ranch across the street.</p> <p>As stated on page two of the staff scoping letter for Harmony Groves Meadows (a previous incarnation of this project on the same site) from 2007 (Exhibit C), small lot sizes are incompatible with the Equestrian Ranch right across the street, as follows (emphasis added):</p> <p>The Harmony Grove Village Specific Plan was recently approved by the Board of Supervisors. This project establishes a land use pattern for the Harmony Grove area with a Village Core surrounded by single-family residential development that decreases in density as distance from the Village Core increases. <i>In addition, the project site is adjacent to the east of the approved Equestrian Ranch. It does not appear that the design of Harmony Grove Meadows has taken into account these recently approved land uses. In particular, the minimum 4000 square foot lots would not be compatible with the approved Equestrian Ranch.</i></p> <p style="text-align: right;">13</p>	<p>Response to Comment O6-31</p> <p>The baseline count of 220 was derived from the General Plan Land Use designation for the property (0.5-acre lots) which yields a gross number of 220. The staff yield estimate from the comment is a Property Specific Request presented as part of the process for establishing the General Plan and not applicable to the Project.</p> <p>Response to Comment O6-32</p> <p>Please see Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis for a discussion of land use compatibility.</p> <p style="text-align: center;">O6-31</p> <p style="text-align: center;">O6-32</p>

COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter O6</p> <p>Please describe how this project is now compatible with that land use, and/or disclose the impact of and associated mitigation measures for not being compatible. ↑ O6-32</p> <p>A feasible alternative was not considered</p> <p>Please review the Harmony Commons Alternative, which meets all the Project objectives and is feasible as it amalgamates elements from DEIR alternatives deemed to be feasible. O6-33</p> <p>In conclusion, the DEIR needs to be recirculated to fully disclose the public safety impacts identified in this letter as well as the other impacts discussed in our previous 2011 letter to the Board of Supervisors regarding the literal gift of 200 units for the asking to the previous applicant. O6-34</p> <p>Respectfully submitted,</p>  <p>Jacqueline Arsivaud Board Chair, EFIGTC</p> <p>Exhibits:</p> <p>Attached:</p> <p>Exhibit A – evacuation modeling Exhibit B – PSR staff report Exhibit C – 2007 scoping letter</p> <p>On Dropbox: Harmony Commons Alternative 2010 PSR staff report 2007 Harmony Groves Meadows scoping letter February 21, 2011 EFIGTC letter to Board re PSR SD7 County staff PowerPoint presentations, poster boards and land use maps from Harmony Grove visioning workshops</p> <p>14</p>	<p>Response to Comment O6-33 The alternative (presented in Letter O3a) has been reviewed, as requested. Please see Response to Comment O3a-50 for a discussion of the Harmony Commons Alternative.</p> <p>Response to Comment O6-34 The County acknowledges the conclusion comments, but disagrees that recirculation of the EIR is required based on issues of safety or land use. Please refer to responses to the individual comments above for rationale as to why Project analyses are adequate and appropriate. Comments provided in 2011, prior to initiation of this Project, are not germane to Project analyses.</p>

EXHIBIT A

Residence and Population Estimate

Community	Homes	People	Horses	Livestock
EXISTING				
Elfin Forest	350	1050	200	30
Harmony Grove	130	390	200	30
Eden Valley	80	240	200	30
Hidden Hills	120	360	0	0
HGV	30	90	0	0
Existing Total	710	2130	600	90
ZONED POTENTIAL GP2020				
Elfin Forest	170	510	97	15
Harmony Grove	230	690	354	53
Eden Valley	40	120	100	15
Hidden Hills	10	30	0	0
HGV	710	2130	118	0
Zoned Potential Total	1160	3480	669	83
Existing + Zoned Potential	1870	5610	1269	173
POTENTIAL ADDITIONAL BY GPA				
Valiano	380	1140	102	15
HGVS	453	1359	0	0
GPA's Total	833	2499	102	15
GRAND TOTAL	2703	8109	1371	188

Evacuation Time Estimate

Existing	
Evacuation Dwelling Units	710
Evacuation Vehicles per DU	3
Evacuating Autos	2130
Evacuating Truck and Trailers	318
Evacuating Vehicles Total	2448
Country Club Dr. Hourly Capacity	1500
Hours to Evacuate	1.6

Existing + Zoned Potential		
Evacuation Dwelling Units	1870	
Evacuation Vehicles per DU	3	
Evacuating Autos	5610	
Evacuating Truck and Trailers	669	
Evacuating Vehicles Total	6279	
Country Club Dr. Hourly Capacity	1500	
Hours to Evacuate	4.2	

Existing + Zoned Potential + Potential by GPA		
Evacuation Dwelling Units	2703	
Evacuation Vehicles per DU	3	
Evacuating Autos	8109	
Evacuating Truck and Trailers	723	
Evacuating Vehicles Total	8832	
Country Club Dr. Hourly Capacity	1500	
Hours to Evacuate	5.9	

EXHIBIT B

PROPERTY SPECIFIC REQUEST

SD7 [2004 Referral #58 Trapp & #59 Gray]

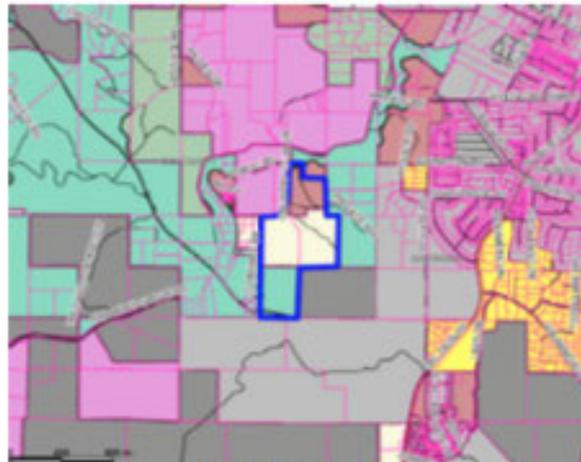
Property Specific Request: Change Land Use Designation from SR2/SR4/RL20 to SR0.5	
Requested by: Randy Coopersmith, Ted Shaw	
Community Recommendation	SR2/SR4 RL20
Opposition Expected ¹	Yes
Spot Designation/Zone	No
EIR Recirculation Needed	No
Change to GPU Objectives Needed	No
Level of Change	Minor

Notes:
1- Based on staff's experience



Aerial

Property Description	
Property Owner: T. H. Harmony Grove LLC	
Size: 112 acres 4 parcels	
Location/Description: Located Southeast of Country Club Drive and the Harmony Grove Village Specific Plan; inside County Water Authority boundary	
Prevalence of Constraints (See following page): ● - high; ◐ - partially; ○ - none	
<ul style="list-style-type: none"> ◐ Steep slope (greater than 25%) ○ Floodplain ○ Wetlands ● Habitat Value ◐ Agricultural Lands ● Fire Hazard Severity Zones 	



PC/Staff Recommendation

Land Use	
<i>General Plan</i>	
Scenario	Designation
Existing General Plan	1 du/4, 8, 20 ac
PC / Staff Recommendation	SR2/SR4/RL20
Referral	VR2/SR2
Hybrid	SR2/RL20
Draft Land Use	SR2/SR4/RL20
Environmentally Superior	
<i>Zoning</i>	
Existing — A70, 4-acre minimum lot size	
Proposed — A70, 2 & 4-acre minimum lot size	

Discussion

This property was originally a 2004 Residential Referrals 58: Trapp and 59: Gray to increase the density of the existing General Plan from Multiple Rural Lands and Impact Sensitive (1 du / 4, 8, 20 ac) to Village Residential 2 (VR2). In 2004 the Board of Supervisors directed staff to apply a VR2 designation to the property. Additionally there was a Plan Amendment Authorization (PAA) for the Harmony Grove Meadows and a project that began processing with DPLU in May 2005. The project was not supported by the Elfin Forest / Harmony Grove Town Council or the San Dieguito Community Planning Group (CPG). In November 2009 the project was withdrawn by the applicant and the property entered into foreclosure and is currently bank-owned.

Continued on next page.

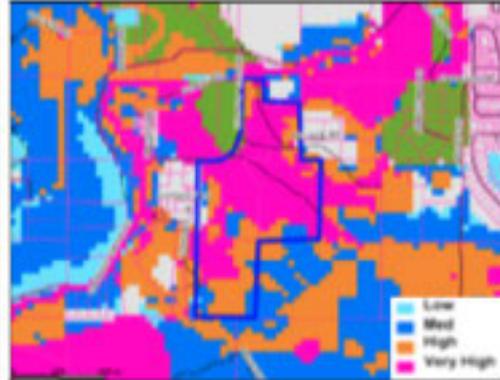
SAN DIEGUITO [ELFIN FOREST - HARMONY GROVE]

PROPERTY SPECIFIC REQUEST

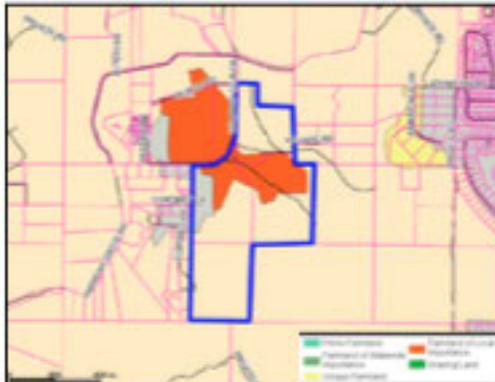
SD7 (cont.)



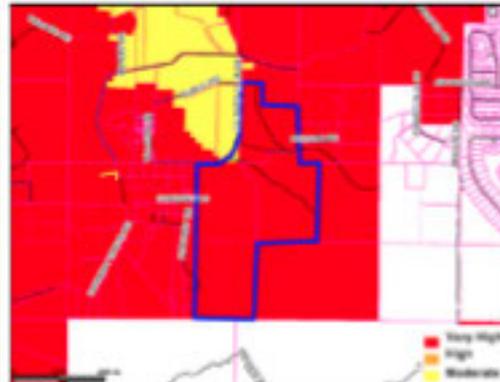
Steep Slope (Greater than 25%)



Habitat Evaluation Model



Agricultural Lands



Fire Hazard Severity Zones

Discussion (cont.)

Nearly one-half of the property is constrained by steep slopes, is nearly entirely constrained by High and Very High Habitat Value, and within the Very High Fire Hazard Severity Zone. The VR2 designation is not supported by the Elfin Forest / Harmony Grove Town Council or the San Dieguito CPG. In addition, the property is outside the Harmony Grove Village boundary proposed in the San Dieguito Community Plan. This Village boundary is the result of several public workshops that developed a compromise position to assign additional density within the Village boundary surrounded by Semi-Rural and Rural Lands. The Harmony Grove Town Council and the San Dieguito CPG support the PCC / Staff Recommendation, which proposes a combination of SR2, SR4, and RL20 designation. Under this recommendation, the SR2 designation is applied to the area adjacent to the Harmony Grove Village where there is less steep slope. The RL20 designation is applied in the southern portion where there is the most steep slope and SR4 to the remaining areas. The applicant is requesting a compromise position of Semi-Rural 0.5, which would be the same base density, but would result in fewer units because of the slope restrictions. The following is an estimate of the potential dwelling unit yield under each of the alternatives:

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- Referral Map — 214 units
- Property Owner's request (SR0.5) — 168 - 180 units

SAN DIEGUITO [ELFIN FOREST - HARMONY GROVE]

EXHIBIT C



GARY L. PRYOR
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. • SUITE 1000
EL CAJON, CA 92025-3902
(619) 441-4600

March 28, 2007

SunCal Companies
Attention: Sam Veltri
1250 Corona Pointe Circle, Suite 210
Corona, CA 92879

RE: HARMONY GROVE MEADOWS; GPA 05-004; SP 05-001; R05-007; TM 5430;
AD 06-062, LOG NO. 05-08-013; FIRST ITERATION REVIEW OF INITIAL
STUDIES/INFORMATION

Dear Mr. Veltri,

The Department of Planning and Land Use (DPLU) has completed the review of your Extended Initial Study/Information and determined it to be "incomplete" as defined by the California Environmental Quality Act (CEQA). At this time, additional information or revisions will be required to determine your project's potential impacts on the environment and complete the CEQA Environmental Initial Study. The reasons for this determination and the revisions/information required are as follows:

MAJOR PROJECT ISSUES

The following project issues were identified during the project scoping and are further discussed in the attachments to this letter. These issues may require substantial redesign of the proposed project or, if not resolved, would result in a recommendation for project denial by DPLU. These issues discussed below, were identified based upon information presently available to the County and are subject to change upon submittal of further information and studies:

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1. Secondary Access - The project does not meet the standards for secondary access set forth in Title 14 section 1273.09 or County Fire Code section 902.2.2.8.

2. Inadequate Emergency Response Times- Emergency response time to the most remote parcel (estimated at 4.4 miles) is 8.13 minutes per NFPA 1142 Table C.1.11(b) and about 9 minutes per Google Map. For parcels less than 2 acres, the County General Plan mandates a travel time of 5 minutes or less

Land Use and Planning

General Plan Amendment Report (GPAR)/ Specific Plan

1. No progress has been made in determining the availability of sewer facilities to serve the project.
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3. The project proposes extensive design guidelines and special development regulations that will require implementation through a Major Use Permit.

Road Improvements

1. The project is required to construct offsite road improvements/ bridge improvements over Escondido Creek. Construction of these improvements will result in substantial cost and require additional environmental study. The project proponents must provide evidence of the ability to dedicate required right-of-way for required off-site road improvements with the appurtenant slopes and drainage for these facilities.

All studies requested in the attachments of this letter should be completed at this time. In the interim, please contact the project manager to schedule a meeting with the applicant/owner/consultants to discuss these issues and the potential resolutions.

REVISIONS AND ADDITIONAL INFORMATION: Comments on various Technical Studies and subject areas are provided as follows:

- Attachment A – Aesthetics/ Visual Analysis
- Attachment B – Agricultural Analysis
- Attachment C – Air Quality Analysis



The following description along with the attached illustration describes a new alternative to the Proposed Project and compares the alternative to the Proposed Project in terms of feasibility, impacts and project objective attainment. The alternative meets CEQA requirements for consideration and, as such, should be fully evaluated in the DEIR.

Description and Setting

The Harmony Common alternative is based on the General Plan Consistent with Sewer alternative and features a mix of residential types chosen from the Proposed Project and other alternatives surrounding a central park common area. The alternative would include four distinct single-family housing types offering a broad range of size options to appeal to a diversity of residents: communal single-family (1) “row house” Cottage type, and (2) “four-pack” Bungalow/Harmony Court type; (3) larger lot single-family residential CSP properties; and (4) senior housing. The senior housing may be attractive to the many long term existing Harmony Grove residents who might welcome local senior housing as an option to "age in place" in their home community.

The central park would include a variety of recreational amenities similar to San Dieguito County Park, and a trail network would link to area trails for the benefit of residents and the community.

Harmony Common possible curated park amenities:

- Fenced dog park
- Playground
- Picnic/barbeque area
- Frisbee golf course
- Functional fitness course
- Gazebos and other open air shelters
- Community gardens
- 4H/FFA animal pens

Rationale for Consideration

The Harmony Common alternative is substantially superior to the Proposed Project, or any other alternative in the DEIR, in its balance of project objective attainment, feasibility and environmental effects. The alternative is composed of elements of the Proposed Project and other feasible alternatives considered in the DEIR yet is substantially dissimilar as a whole from any other alternative. State CEQA Guidelines section 15126.6 (a) requires that the lead agency evaluate alternatives "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The alternative meets these standards and therefore should be fully evaluated in the DEIR. Moreover, under the rule of reason, the alternative must be considered to permit a reasoned choice; and the failure to consider it would preclude a reasoned choice.



Feasibility

The Harmony Common alternative proposes the same density as the General Plan Consistent with Sewer alternative, which is feasible per the DEIR, and the Harmony Common alternative is composed of portions of the Proposed Project and alternatives chosen for analysis in the DEIR in part for their feasibility and thus would be similarly feasible. In addition, the alternative would be more feasible than the Proposed Project in many ways because of reduced grading, infrastructure and entitlement expenses. And, with relatively inexpensive amenities offset by significantly reduced grading costs as well as a simplified road network and more efficient land use for the denser housing types, as compared to the General Plan Consistent with Sewer alternative, the Harmony Common alternative would be more feasible.

Impact Comparison

The environmental effects of the Harmony Common alternative would be substantially lessened as compared to the Proposed Project, and the alternative is environmentally superior to the Proposed Project. Impacts would be similar to the General Plan Consistent with Sewer alternative, but with more land set aside as open space for biological preservation and recreation, the impacts of the Harmony Common alternative would be less.

Compliance with Project Objectives

The Harmony Common alternative meets every project objective, in most cases better than does the Proposed Project, while limiting density to safe General Plan levels in the wildfire-prone Plan area. In addition, the alternative would provide a public facilities benefit by incorporating a central Common preserving a beautiful topographical feature for the enjoyment of the community which the Proposed Project does not provide. A description of how the alternative complies with each of the project objectives in comparison to the Proposed Project follows.

Objective 1. Efficiently develop property in close proximity to an existing village consistent with the Community Development Model to create one complete and vibrant community that would enhance and support the economic and social success of the village and Project by increasing the number and diversity of residential opportunities.

Harmony Common as a complement and extension of the Community Development Model (CDM) existing at Harmony Grove Village would be more consistent with the CDM than the Proposed Project because it would preserve more of the structure of the CDM which envisions a densely developed central area surrounded by progressively less dense uses terminating at the fringes with rural densities complementary to traditional existing properties in the area. Taking the two adjacent master planned developments in Harmony Grove, Harmony Grove Village (HGV) and Harmony Grove Village South (HGVS), as a holistic CDM area, the Proposed Project is on the fringes of the area and in order to maintain consistency with the CDM should feature less dense housing congruent with nearby existing



rural uses. Instead, the Proposed Project would introduce more dense housing than even the central core of HGV, and is not only inconsistent with the CDM but would represent an aberration of the model.

The Harmony Common alternative would also introduce more density to the fringe of an expanded CDM area than would be ideal for CDM consistency, but far less than the Proposed Project. Also, the Harmony Commons alternative would provide larger lot single-family residential Conservation Subdivision Program (CSP) compliant properties around most of the perimeter of the project area which would be consistent with the CDM model. The CSP compliant properties would also be more consistent with nearby rural uses, and alternative septic should be evaluated as an option for these properties to enhance consistency with neighboring rural properties and the Elfin Forest/Harmony Grove Community Plan, as well as to reduce the demand placed upon and the public infrastructure expense associated with the project WWTRF. The larger CSP properties in combination with the “four-pack” Bungalow and Harmony Court housing types as well as the smaller “row house” Cottage type, and senior housing type will provide four distinct types of housing opportunities with a greater diversity of densities than the Proposed Project, which essentially offers only a choice of “dense or denser” apartment/condo, no yard, narrow setback options. In addition, the central Common would provide “room to roam” for residents of more dense units, and be consistent with the HGV equestrian center across Country Club Drive, a contiguous, complementary recreation area for the benefit of the community.

For these reasons, the Harmony Common alternative would fulfill this project objective better than would the Proposed Project.

Objective 2. Contribute to the establishment of a community that encourages and supports multi-modal forms of transportation, including walking and bicycling, by locating near regional employment and transit centers.

Harmony Common would fulfill the project objective to encourage and support multi-modal forms of transportation better than would the Proposed Project because in addition to non-automotive transportation such as walking and bicycling, the alternative would encourage and support equine transportation by enabling residents of the larger CSP properties to house and utilize horses for local transportation and recreation.

Objective 3. Preserve and enhance sensitive biological resources, habitats, and landforms in dedicated open space easements.

More sensitive biological resources, habitats and landforms would be preserved in dedicated open space easements under the Harmony Common alternative than the Proposed Project, fulfilling the project objective better than would the Proposed Project.

Objective 4. Provide a variety of passive and active recreational opportunities in support of the County’s goals to encourage healthy and active lifestyles through the creation of public and private parks,



pathways, and trails that provide connectivity to the area's preserved natural lands and nearby village uses.

With far more property provided than the Proposed Project to support a variety of passive and active recreational opportunities including those at the central Common as well as larger backyards and a trail network connecting to natural lands in the area, Harmony Common would meet the project objective better than would the Proposed Project.

Objective 5. Provide a mix of residential uses that will provide a broad range of housing choices which support a diversity of resident and land uses within the Project.

Harmony Common would fulfill this project objective better than would the Proposed Project because the alternative would provide a greater diversity of housing type and broader property and dwelling size range than would the Proposed Project. The alternative would include four distinct single-family housing types offering a broad range of size options to appeal to a diversity of residents: communal single-family (1) "row house" Cottage type, and (2) "four-pack" Bungalow/Harmony Court type; (3) larger lot single-family residential CSP properties; and (4) senior housing. High density multi-family housing has been excluded from the alternative because it is entirely inconsistent with the surrounding community, inconsistent with the CDM, dangerous as it introduces densities severely impacting safe evacuation, and inappropriate in a rural setting. By contrast, the Proposed Project offers only three housing types: (1) multi-family high density "apartment" type Farmhouse and Granary; communal single-family (2) "row house" Cottage type and (3) "four-pack" Bungalow/Harmony Court type. All of these are essentially "dense or denser" apartment/condo, no yard, narrow setback communal options providing very little practical variation as compared to the broad range of options available with the Harmony Common alternative. For these reasons, the Harmony Common alternative would fulfill this project objective better than would the Proposed Project.

Objective 6. Create a mixed-use development that is compatible with existing and planned development in the immediate vicinity of the property while optimizing the operational effectiveness of public facilities and services of the Project and the existing village by increasing the number and diversity of residents within the Project.

Harmony Common would fulfill this project objective better than would the Proposed Project because the alternative would be far more compatible with existing rural and semi-rural residential uses in Harmony Grove than would the Proposed Project, while being equivalently compatible with HGV, the other planned development in the immediate vicinity of the property. And, while Harmony Common would increase the number of residents to a lesser extent than the Proposed Project, the alternative would attract a wider diversity of residents, because of the wider diversity of residential types offered ranging from senior living opportunities, to smaller communal condo units, to single-family properties large enough to incorporate onsite alternative septic waste treatment, and include lower cost public facilities and services, including a smaller, less costly WWTRF, thereby optimizing public facility operational effectiveness relative to the size and diversity of the residential population of the



alternative. The smaller and more diverse population would also be better balanced with the existing surrounding community, and create a lower burden on the infrastructure of stressed roadways and intersections as well as other public facilities, particularly in nearby municipalities. For these reasons, the Harmony Common alternative would optimize the operational effectiveness of public facilities and services and existing infrastructure better than the Proposed Project and fulfill this project objective better than would the Proposed Project.

Objective 7. Create a destination gathering place that provides a variety of land uses that encourage walkability, social interaction and economic vitality for the Project, and with the existing village and the surrounding areas.

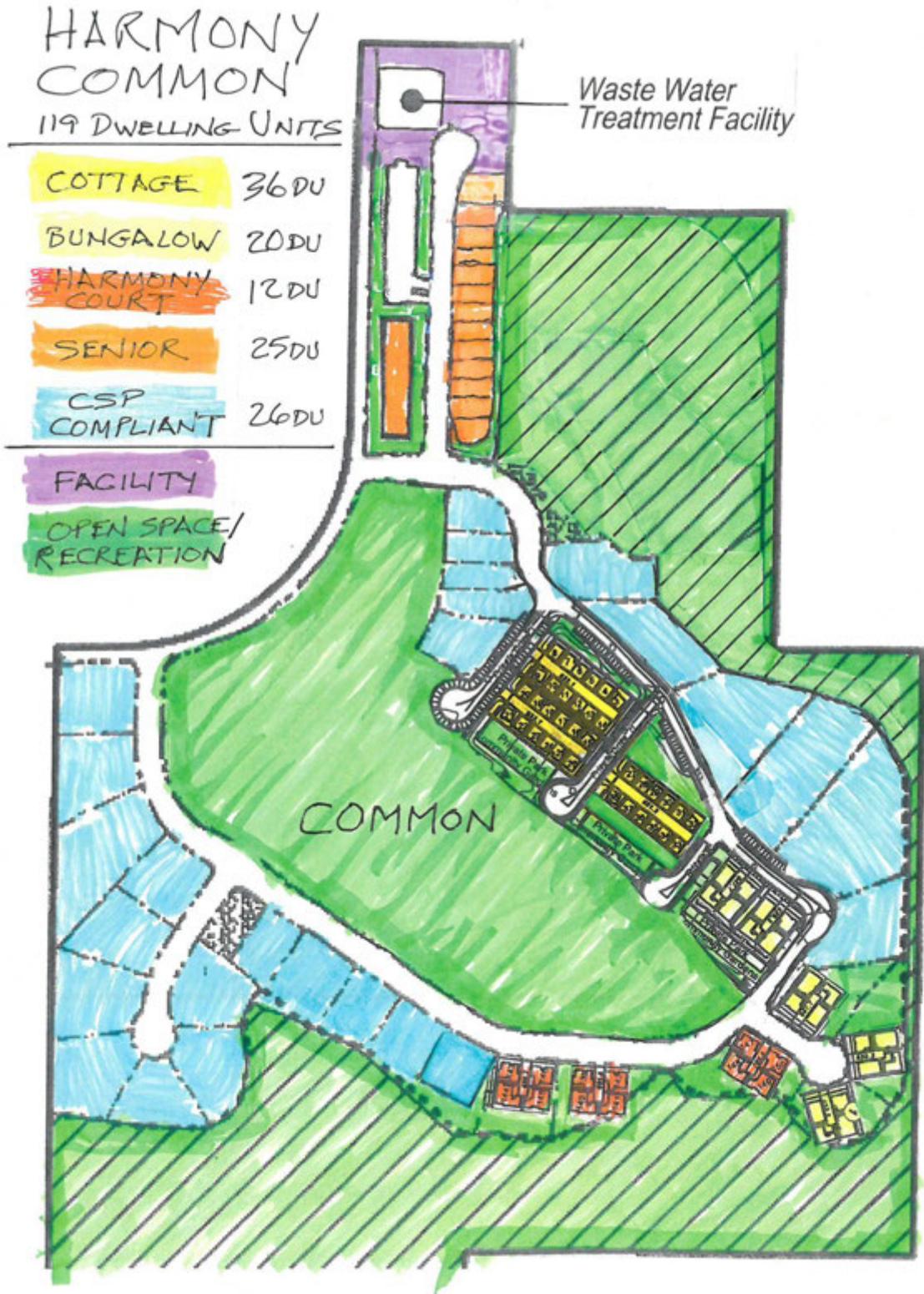
The destination gathering place envisioned for Harmony Common would leverage and preserve a unique topographical feature of the project site, and, in comparison to the typical retail/commercial destination gathering place envisioned for the Proposed Project, would be a special destination and public benefit meeting the project objective better than would the Proposed Project. The unique topographical feature is the lovely north facing hillside in the middle of the project site with beautiful views of the nearby Harmony Grove area as well as the hills surrounding Escondido and San Marcos, a unique value to be preserved and shared for the benefit of the community under the Harmony Common alternative. The natural beauty of the hillside would be preserved as the central Common and would be enhanced with a suite of attractive communal amenities including a trail network connected to the extensive local trail network, creating a magnetic, uniquely beautiful destination gathering place which the Proposed Project does not offer.

In comparison, the destination gathering place envisioned in the Proposed Project consists of a relatively small civic center structure, with room for only limited commercial food and beverage services, and exterior recreation facilities typical of condominium developments. These facilities would be in no way unique, are readily available elsewhere including in HGV, would encourage less walkability than the Common, no more social interaction, and are usually economically anemic, at best. The facilities would of course have convenience value for community residents, but they are ordinary. The Common would be something special; a jewel to be shared and appreciated by Harmony Common residents and the wider Harmony Grove community.

By contrast, the Proposed Project would extensively grade the hillside for hundreds of high density apartments and condos rather than preserve and enhance the site, destroying the potential to create a shared public benefit with this uniquely valuable feature and forever privatizing the location for the enjoyment of the few fortunate apartment/condo owners or renters who happen to live in one of the view units. For everyone else in the development and the surrounding community the value of the location would be irreparably degraded and destroyed.



Site Map





County of San Diego

GARY L. PRYOR
DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

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EL CAJON OFFICE
200 EAST MAIN ST. • SIXTH FLOOR
EL CAJON, CA 92020-3912
(619) 441-4030

March 28, 2007

SunCal Companies
Attention: Sam Veltri
1250 Corona Pointe Circle, Suite 210
Corona, CA 92879

RE: HARMONY GROVE MEADOWS; GPA 05-004; SP 05-001; R05-007; TM 5430;
AD 06-062, LOG NO. 05-08-013; FIRST ITERATION REVIEW OF INITIAL
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1. The project is required to construct offsite road improvements/ bridge improvements over Escondido Creek. Construction of these improvements will result in substantial cost and require additional environmental study. The project proponents must provide evidence of the ability to dedicate required right-of-way for required off-site road improvements with the appurtenant slopes and drainage for these facilities.

All studies requested in the attachments of this letter should be completed at this time. In the interim, please contact the project manager to schedule a meeting with the applicant/owner/consultants to discuss these issues and the potential resolutions.

REVISIONS AND ADDITIONAL INFORMATION: Comments on various Technical Studies and subject areas are provided as follows:

- Attachment A – Aesthetics/ Visual Analysis
- Attachment B – Agricultural Analysis
- Attachment C – Air Quality Analysis

- Attachment D – Biological Resources Report
- Attachment E – Cultural Resources
- Attachment F – Geology/ Soils
- Attachment G – Hazards – Fire Protection Plan
- Attachment H – Hydrology and Water Quality (includes Drainage, Flooding and Revised SWMP)
- Attachment I – Land Use and Planning
- Attachment J – Mineral Resources
- Attachment K – Noise
- Attachment L – Population and Housing – Growth Induction Analysis
- Attachment M – Public Services, Utilities and Service Systems
- Attachment N – Recreation
- Attachment O – Traffic Impact Analysis

If you have any specific questions regarding these comments, please contact Lori Spar, Environmental Coordinator at (858) 694-2969 or by e-mail at Lori.Spar@sdcountry.ca.gov.

NOTICE OF PREPARATION (NOP): Staff will be preparing and circulating the project's NOP. In order to begin this process a revised Project Plot Plan (11" x 17" max.) is required. Submittal requirements are detailed below.

DRAFT ENVIRONMENTAL IMPACT REPORT: In accordance with our BPR practices, technical review of extended studies may occur simultaneously with preparation and review of the Screencheck EIR. Therefore, please contact Lori Spar, Project Environmental Coordinator, for any assistance in the initial preparation and submittal of the EIR. Please refer to our letter dated March 26, 2006 for details regarding the format and content of the EIR, as well as those resources areas that must be addressed in the environmental document. Upon completion of the public review period for the NOP, staff will review all comments received, including those from the public scoping meeting. If there are any comments that require changes to the scope of the EIR, staff will provide you with further direction.

PROJECT SCHEDULE: An updated copy of your project schedule is attached showing an estimated hearing/decision date of January 28, 2009.

SUBMITTAL REQUIREMENTS (Technical Studies): Unless other agreements have been made with County staff, you must comply with the following submittal requirements in order to make adequate progress and to minimize the time and cost in the processing of your application:

1. Submit a copy of this letter.

2. **YOU ARE REQUIRED TO SUBMIT A NEW APPLICATION FOR A VESTING TENTATIVE MAP SITE PLAN. YOU WILL ALSO NEED TO SCHEDULE AN APPOINTMENT WITH THE ZONING COUNTER (858-565-5981) TO MAKE YOUR COMPLETE SUBMITTAL. PLEASE MAKE THE APPOINTMENT AS SOON AS POSSIBLE, AS THE WAIT TIME FOR APPOINTMENTS FLUCTUATES.**

3. Submit a separate letter that indicates specifically where and how each of the above comments is addressed in the revised information/documents. For simple comments it is acceptable to merely reference the document, page and paragraph number where the strikeout/underline revisions have been made. Otherwise, the rationale for the revisions (or lack of revisions) must be given.

6. The following information and/or document(s) with the requested number of copies as specified. **The Project Number and Environmental Log Number must be clearly and visibly labeled on all submitted documents. All changes to the document(s) must be in strikeout/underline format.**

INFORMATION/DOCUMENT	NO. OF COPIES	LEAD REVIEW DEPT./SECTION
Replacement Tentative Map (Maps must be folded to 8-1/2 x 11 maximum with the lower right hand corner exposed)	30	PPCC for Distribution
"Redlined" Replacement Plot Plan/Tentative Map/Tentative Parcel Map highlighting all changes	2	Bill Stocks (1), Lori Spar (1)
Revised Preliminary Grading Plan	5	Bill Stocks (1), Lori Spar (1), DPW (2), DEH (1)
A separate letter addressing staff comments as described above in #4 of the "Submittal Requirements".	3	Bill Stocks (1), Lori Spar (1), DPW (1)
General Plan Amendment Report (GPAR)/ Specific Plan Text	9	Bill Stocks (4), Lori Spar (1) DPW Land Development (1), DPW Route Locations, DPR (1), San Dieguito Planning Group (1)
Revised Air Quality Analysis	3	Bill Stocks (1), Lori Spar (1), Air Quality Specialist (1)

INFORMATION/DOCUMENT	NO. OF COPIES	LEAD REVIEW DEPT./SECTION
Biological Resources Report (including Habitat Management Plan, revised open space map with fencing and signage plan)	3	Bill Stocks (1), Lori Spar (1), Biology Specialist (1)
Cultural Resources Report	3	Bill Stocks (1), Lori Spar (1), Archeological Specialist (1)
Visual Analysis	2	Bill Stocks (1), Lori Spar (1)
Fire Protection Plan	5	Bill Stocks (1), Lori Spar (1) DPW (1), Elfin Forest Protection District (1), DPLU Fire Marshall (1)
CEQA Drainage Study	3	Bill Stocks (1), Lori Spar(1) DPW (1)
Stormwater Management Plan	4	Bill Stocks (1), Lori Spar (1), DPW (1), Hazards Specialist
Acoustical Analysis	3	Bill Stocks (1), Lori Spar (1), Noise Specialist (1)
Growth Induction Analysis	3	Bill Stocks (2), Lori Spar (1)
Traffic Impact Analysis	4	Bill Stocks (1), Lori Spar (1), DPW Land Development (1), DPW Route Locations (1)
Resource Protection Study	5	Bill Stocks (2), Lori Spar (1), Archaeology Specialist (1), Biology Specialist (1), DPW (1)

INFORMATION/DOCUMENT	NO. OF COPIES	LEAD REVIEW DEPT./SECTION
CD containing all technical studies in Word Format	10	Bill Stocks (1), Lori Spar (1), DPW Land Development (1), DPW Route Locations (1) Agriculture Specialist (1), Air Quality Specialist (1), Archaeology Specialist (1), Biology Specialist (1), Geology Specialist (1), Noise Specialist (1)
The staff turnaround goal for review of the requested information/document is 30 days.		

*Please contact me in advance for a Special Handling Form if you wish to submit other documents supporting the Replacement Tentative Map revisions.

To assure timely cost-effective processing of your project, all items must be submitted concurrently and delivered to DPLU Zoning Counter at 5201 Ruffin Road, Suite B, San Diego, CA 92123.

RESUBMITTAL DUE DATE: In order to maintain adequate progress and be consistent with the Estimated Processing Schedule (attached), DPLU recommends that all of the revisions/information requested in this letter be submitted by **November 23, 2007**. If you are unable to submit the requested revisions/information by the above date, please contact your DPLU Project Manager to submit a due date extension notification. Notification must be submitted in writing and be signed and dated by the project applicant. The notification must include a revised submittal date and a brief rationale for the extension. Be aware if the submittal is deemed to be excessively late (generally six or more months), notifications are not received, or your project is excessively behind schedule the Department may make a recommendation for denial of your project to the appropriate decision-making authority based upon inadequate progress pursuant to CEQA Guidelines Section 15109.

SUBMITTAL REQUIREMENTS (Public Review of NOP): Unless other agreements have been made with County staff, you must comply with the following submittal requirements prior to beginning public review of the NOP for your project.

1. A copy of this letter.

2. The following information and/or document(s) with the requested number of copies as specified. **The Project Number and/or Environmental Log Number must be clearly and visibly labeled on all submitted documents.**

INFORMATION/DOCUMENT	NO. OF COPIES	LEAD REVIEW/SECTION OR DEPT
Project Plot Plan (11" x 17" max.)	55	DPLU – Resource

RESUBMITTAL DUE DATE: In order to maintain adequate progress and be consistent with the Estimated Processing Schedule (attached), DPLU recommends that all of the revisions/information requested in this letter be submitted by **April 2, 2007**. If you are unable to submit the requested revisions/information by the above date, please contact your DPLU Project Manager to submit a due date extension notification. Notification must be submitted in writing and be signed and dated by the project applicant. The notification must include a revised submittal date and a brief rationale for the extension. Be aware if the submittal is deemed to be excessively late (generally six or more months), notifications are not received, or your project is excessively behind schedule the Department may make a recommendation for denial of your project to the appropriate decision-making authority based upon inadequate progress pursuant to CEQA Guidelines Section 15109.

SUBMITTAL REQUIREMENTS (Screencheck of Draft EIR): Unless other agreements have been made with County staff, you must comply with the following submittal requirements in order to make adequate progress and to minimize the time and costs in the processing of your application:

1. A copy of this letter.
2. The following information and/or document(s) with the requested number of copies as specified. **The Project Number and/or Environmental Log Number must be clearly and visibly labeled on all submitted documents.**

INFORMATION/DOCUMENT	NO. OF COPIES	LEAD REVIEW DEPT./SECTION
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INFORMATION/DOCUMENT	NO. OF COPIES	LEAD REVIEW DEPT./SECTION
Draft EIR (w/ CD in Word format)	11	Bill Stocks (1), Lori Spar (1), DPW Land Development (2), DPW Route Locations (1) Agriculture Specialist (1), Air Quality Specialist (1), Archaeology Specialist (1), Biology Specialist (1), Geology Specialist (1), Noise Specialist (1)

RESUBMITTAL DUE DATE: In order to maintain adequate progress and be consistent with the Estimated Processing Schedule (attached), DPLU recommends that all of the revisions/information requested in this letter be submitted by **November 23, 2007**. If you are unable to submit the requested revisions/information by the above date, please contact your DPLU Project Manager to submit a due date extension notification. Notification must be submitted in writing and be signed and dated by the project applicant. The notification must include a revised submittal date and a brief rationale for the extension. Be aware if the submittal is deemed to be excessively late (generally six or more months), notifications are not received, or your project is excessively behind schedule the Department may make a recommendation for denial of your project to the appropriate decision-making authority based upon inadequate progress pursuant to CEQA Guidelines Section 15109.

PROJECT ISSUE RESOLUTION PROCESS: If you have disagreements with the requirements within this letter you may, after trying to resolve issues with project staff, have these issues referred to the Project Issue Resolution process to provide you with an opportunity to quickly and inexpensively have issues considered by senior County management. Issues considered under this procedure can include disagreements with staff interpretations of codes or ordinances, requests for additional information or studies, or disagreements regarding project related processing requirements. This process does not replace any other appeal mechanisms such as those for CEQA determinations or administrative appeals. Please contact me to learn more about this process, the limitations, or to request an application form.

Harmony Grove Meadows,
SP 05-001, etc.

- 9 -

March 28, 2007

If you have any questions or need additional information, please contact me at (858) 694-3913 or at william.stocks@sdcountry.ca.gov.

Sincerely,

WILLIAM STOCKS, Project Manager
Regulatory Planning Division

WS:ws

Attachments:
(see Pages 2-3 for the list of Attachments A-O)

- Attachment P – Updated Estimated Processing Schedule
- Attachment Q- Preliminary DPW Requirements

cc: David Sibbet, Latitude 33, 4933 Paramount Drive, 2nd Floor, San Diego, CA 92123
Lee Shick, Project Manager, Department of Public Works, M.S. 0336
Devon Muto, Planning Manager, Department of Planning and Land Use, M.S. 0650
Joe Farace, Planning Manager, Department of Planning and Land Use, M.S. 0650
Lori Spar, EIR Coordinator, Department of Planning and Land Use, M.S. 0650

ATTACHMENT A
AESTHETICS/ VISUAL ANALYSIS

The applicant has indicated that the analysis for this subject area will be provided with the submittal of the EIR.

ATTACHMENT B
AGRICULTURAL ANALYSIS

DPLU staff has completed the review of the initial submittal of extended studies for agricultural resources completed by Lance Unverzagt and submitted to the County on October 20, 2006. The study has been accepted as complete.

ATTACHMENT C AIR QUALITY ANALYSIS

DPLU Air Quality Specialist, Mario Covic has reviewed the technical study prepared by Charles Bull of RECON. Staff's specific comments about these documents are as follows:

All revisions must be completed in a strikeout/underline format.

1. Cover of the technical report. Replace the words "Certified Preparer" with "County of San Diego Approved CEQA Consultant."
1. Page 2, second paragraph, first sentence. Replace "San Diego County" with "the County of San Diego Department of Planning and Land Use."
2. Page 16, Enhanced Motor Vehicle Inspection and Maintenance & Clean Vehicle Program. These two bullets do not go far enough in explaining the "program." Who is responsible how is the "program" implemented.
3. Page 21, second to last paragraph, first sentence. After the word "thresholds" add "(except for the ozone precursors)."
4. Pages 21, 22 & 23. The discussion on TACs sets the threshold of significance for impacts to sensitive receptors at cancer risk level greater than 10 in a million by referencing SDAPCD Rule 1210. DPLU staff and SDAPCD staff agree that a cancer risk level greater than one and less than 10 can be considered Less than Significant with the use of T-BACTs (diesel particulate filters on construction vehicles and use of ultra low sulfur fuels). Please add "with the use of T-BACTs" in the description of the threshold on page 21 & 22. Make all the actual threshold statements bold (this includes the last statement in Section 5.4 of page 23).
5. Page 27. Add the words "and roadway segment" after the word "intersection" used in Section 6.2.2.
6. Pages 27, 28 & 29 – Section 7.0. This section or somewhere else in this study, a detailed discussion on the mitigation measures and how they will reduce emission levels (%) must be included. In addition any modifications to the default values in URBEMIS and mitigations selected should be discussed, justified and in the case of mitigations, enforceable. Language like that in 7. on page 28 (maximum extent feasible) can not be included in the mitigation measures as it is very unclear.

7. Currently, the Technical Analysis identifies significant and unmitigated impact due to ROG emissions. Staff would like to discuss this determination. It is unclear as to why this project would have this determination and the technical study does not adequately explain. Minimally, the discussion should include all potential mitigations measures for reducing ROG emissions and why none of them are feasible mitigation to reduce the level of impact.

ATTACHMENT D BIOLOGICAL RESOURCES REPORT

Staff has completed the first iteration review of the Biological Resources Report for the Harmony Grove property prepared by Recon Environmental dated October 19, 2006 and submitted to the County October 20, 2006. Please address the following comments prior to the next submittal:

1. Since the North County MSCP is not approved, please use mitigation ratios as outlined in the County of San Diego Guidelines for Determining Significance (Table 5). The text throughout the report (example pp 2, 40, 41) referring to MSCP ratios and mitigating in accordance with the BMO/MSCP shall be revised accordingly. Also please do not use Tiers when classifying habitat sensitivity as this term is applied to habitats within the approved MSCP.
2. Spring rare plant surveys were conducted in June 28, 2006. This survey date is very late and given the sensitive soils onsite updated surveys are required.
3. Page 15: there is a statement that coastal sage scrub onsite is of low quality. Please rate the quality of coastal sage scrub according to the NCCP Conservation and Process Guidelines flowchart.
4. Pages 16 and 17 are duplicates.
5. Page 19: When determining if species are sensitive please include the County Sensitive Plant and Animal Lists as found in the County of San Diego Guidelines for Determining Significance Tables 2 and 3.
6. Please include ashy spike moss-a County group D sensitive species in the discussion of sensitive plant species onsite.
7. Portions of the proposed fuel management zone don't make sense. The fuel management zone should be adjacent to structures not the property line or biological open space. Please also verify that 100 ft of fuel clearing is adequate based on an approved Fire Protection Plan.
8. The width of the limited building zone (LBZ) easement should also be consistent with the amount of fuel clearing required.
9. The lots 49, 50 and 53 through 59 are shown in the LBZ. This is not allowed as fire clearing will impact the proposed open space easement.
10. There is grading shown in the proposed open space easement. Grading is not permitted within this easement.

11. The open space boundary is an irregular shape. To reduce edge effects, the boundary should be as straight as possible.
12. Page 40:
 - a. Strike the paragraph referencing the Draft North County MSCP at the top of the page.
 - b. Revise table 4 to include updated mitigation ratios and delete the 'Tier' column. See comment 1 above.
 - c. Revise discussion on wart-stemmed ceanothus to refer to County Significance Guidelines and not the BMO.
13. Please explain how connectivity to Escondido Creek remains offsite. That is, is there a likelihood of development offsite eliminating this connection? Also, please include information on the wildlife corridor width as proposed and over what length it is constrained as a result of development.
14. The project will be subject to the Habitat Loss Permit Ordinance and must conform with the NCCP 4(d) findings. In particular

Finding 1.b: The habitat loss will not preclude connectivity between areas of high habitat values.

Finding 1.c: The habitat loss will not preclude or prevent the preparation of the subregional NCCP.

Finding 1.d: The habitat loss has been minimized and mitigated to the maximum extent practicable in accordance with Section 4.3 of the NCCP Process Guidelines.

Consultation with the Wildlife Agencies (US Fish and Wildlife Service and CA Department of Fish and Game) may result in project redesign to meet the above findings. Once the mitigation ratios have been revised, the project will be ready to go to batching to consult with the Wildlife Agencies.

15. A Habitat Management Plan will be required for the onsite open space. A conceptual Habitat Management Plan (HMP) is required at this stage of the application process. As part of the conceptual HMP identify the owner of the site and the habitat manager. Explain the financial means to implement the plan. In order to facilitate transfer of fee title a separate open space lot shall be proposed. A replacement map is required. Explain the financial means to implement the plan.

16. The mitigation ratio for riparian habitat (Table 8) shall be at 3:1 which includes a 1:1 creation component to comply with CEQA.
17. Please include the following mitigation measures as part of Section 6.0 Mitigation Recommendations.
 - a. Fencing and signage of proposed open space easement
 - b. Habitat Management Plan for proposed open space easement

ATTACHMENT E CULTURAL RESOURCES

Staff has reviewed the cultural resources report entitled, "Results of Cultural Resources Survey for the Harmony Grove Meadows Project", dated October 17, 2006 prepared by Harry Price of RECON. The study is well written and staff appreciates the attention to detail. The report provides the results of a cultural resource survey. No previously recorded sites were identified within the project boundaries, however one historic archaeological resource was identified during the survey and determined "not significant". Staff agrees with the findings. However, because the surrounding area is rich in archaeological resources and because the local Luiseno have identified adjacent projects (Harmony Grove Village) as an area of concern, the project will be conditioned with a monitor during the grading phase of the project.

The following revisions need to be made to the study. All revisions must be in underline/strikeout format.

1. Throughout the document replace the temporary number (HG-HJP-1) with the primary number given the resource by the South Coastal Information Center.
2. Staff requested that a Native American monitor be present during the survey. Revise the methods section (5.0) of the study to identify the monitor.
3. Page 2, Paragraph 1: Revise the 1st sentence to read, "...the South Coastal Information..."
4. 8.4 Recommendations (page 36): Because the surrounding area is rich in archaeological resources and because the local Luiseno have identified adjacent projects (Harmony Grove Village) as an area of concern, revise this section to include grading monitoring as a condition of approval.
5. The following are Preliminary Conditions that should be incorporated into the Cultural Resources Report.

Prior to Approval of Grading or Improvement plans, the subdivider shall:

- A. Implement a grading monitoring and data recovery program to mitigate potential impacts to undiscovered buried archaeological resources on the Harmony Grove Meadows Project, TM5430Rpl/Log No. 05-08-013 to the satisfaction of the Planning Director. This program shall include, but shall not be limited to, the following actions:

1. Provide evidence to the Department of Planning and Land Use that a County approved archaeologist has been contracted to implement a grading monitoring and data recovery program to the satisfaction of the Director of Planning and Land Use (DPLU). A letter from the Project Archaeologist shall be submitted to the Director of Planning and Land Use. The letter shall include the following guidelines:
 - a. The consulting archaeologist shall contract with a Native American monitor to be involved with the grading monitoring program.
 - b. The County approved archaeologist and Native American monitor shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.
 - c. The consulting archaeologist shall monitor all areas identified for development.
 - d. An adequate number of monitors (archaeological/historical/Native American) shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities.
 - e. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be onsite fulltime. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Principal Investigator in consultation with the Native American monitor.
 - f. Monitoring of previously disturbed areas, graded areas, or areas that contain non-cultural and geologically sterile material, shall be monitored at the discretion of the Principal Investigator as dictated by the potential, or absence of potential, to encounter cultural materials.
 - g. Isolates and clearly non-significant deposits shall be minimally documented in the field and the monitored grading can proceed.

- h. In the event that previously unidentified potentially significant cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The archaeologist shall contact the County Archaeologist at the time of discovery. The archaeologist, in consultation with County staff archaeologist, shall determine the significance of the discovered resources. The County Archaeologist must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the County Archaeologist, then carried out using professional archaeological methods.
- i. If any human bones are discovered, the Principle Investigator shall contact the County Coroner. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains.
- j. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Principle Investigator shall determine the amount of material to be recovered for an adequate artifact sample for analysis.
- k. In the event that previously unidentified cultural resources are discovered, all cultural material collected during the grading monitoring program shall be processed and curated at a San Diego facility that meets federal standards per 36 CFR Part 79, and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation

facility identifying that archaeological materials have been received and that all fees have been paid.

- I. In the event that previously unidentified cultural resources are discovered, a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Director of Planning and Land Use prior to the issuance of any building permits. The report shall include Department of Parks and Recreation Primary and Archaeological Site forms.
 - m. In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the Director of Planning and Land Use by the consulting archaeologist that the grading monitoring activities have been completed.
2. Provide Evidence to the Director of Planning and Land Use that the following notes have been placed on the Grading Plan:
 - a. The County approved archaeologist and Native American monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the monitoring program.
 - b. The consulting archaeologist shall monitor all areas identified for development.
 - c. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be onsite full-time to perform full-time monitoring as determined by the Principle Investigator of the excavations. The frequency of inspections will depend on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features.
 - d. Monitoring of previously disturbed areas, graded areas, or areas that contain non-cultural and geologically sterile material, shall be monitored at the discretion of the Principal Investigator as dictated by the potential, or absence of potential, to encounter cultural materials.

- e. In the event that previously unidentified potentially significant cultural resources are discovered, the archaeological monitor(s) shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow evaluation of potentially significant cultural resources. The Principle Investigator shall contact the County Archaeologist at the time of discovery. The Principle Investigator, in consultation with County staff archaeologist, shall determine the significance of the discovered resources. The County Archaeologist must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the County Archaeologist, then carried out using professional archaeological methods.
 - f. If any human bones are discovered, the Principle Investigator shall contact the County Coroner. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains.
 - g. Prior to rough grading inspection sign-off, provide evidence that the field grading monitoring activities have been completed to the satisfaction of the Director of Planning and Land Use. Evidence shall be in the form of a letter from the Project Archaeologist.
3. Prior to Final Grading Release, submit to the satisfaction of the Director of Planning and Land Use, a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program. The report shall also include the following:
 - a. Department of Parks and Recreation Primary and Archaeological Site forms.
 - b. Evidence that all cultural collected during the grading monitoring program has been curated at a San Diego facility that meets federal standards per 36 CFR Part 79, and

therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the Director of Planning and Land Use by the consulting archaeologist that the grading monitoring activities have been completed.

Or

Enter into a Secured Agreement with the County of San Diego, Department of Planning and Land Use, secured by a letter of credit, bond, or cash for 150 percent of the estimated costs associated with the preparation of the Final Report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program, and a 10 percent cash deposit not to exceed \$30,000. A cost estimate shall be submitted and approved by the Director of Planning and Land Use for the cost of preparing the Final Grading Monitoring that includes artifact analysis, and specialized studies such as lithics analysis, ceramics analysis, faunal analysis, floral analysis, assemblage analysis, radiocarbon dating, and curation as determined by the Project Archaeologist in consultation with County Staff Archaeologist.

Prior to recordation of the Final Map, the applicant shall:

- A. Complete and submit a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program to the satisfaction of the Director of Planning and Land Use. The report shall also include the following:
 1. Department of Parks and Recreation Primary and Archaeological Site forms.

2. Evidence that all cultural collected during the grading monitoring program has been curated at a San Diego facility that meets federal standards per 36 CFR Part 79, and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the Director of Planning and Land Use by the consulting archaeologist that the grading monitoring activities have been completed.

Or

Enter into a Secured Agreement with the County of San Diego, Department of Planning and Land Use, secured by a letter of credit, bond, or cash for 150 percent of the estimated costs associated with the preparation of the Final Report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program, and a 10 percent cash deposit not to exceed \$30,000. A cost estimate shall be submitted and approved by the Director of Planning and Land Use for the cost of preparing the Final Grading Monitoring that includes artifact analysis, and specialized studies such as lithics analysis, ceramics analysis, faunal analysis, floral analysis, assemblage analysis, radiocarbon dating, and curation as determined by the Project Archaeologist in consultation with County Staff Archaeologist.

**ATTACHMENT F
GEOLOGY/ SOILS**

Jim Bennett, staff geologist, has completed review of the Preliminary Geotechnical Investigation, Harmony Grove Meadows, dated July 26, 2006, prepared by Geotechnics, Inc. The report adequately addresses concerns of landslide potential at the project site. No further revisions are required.

ATTACHMENT G HAZARDS – FIRE PROTECTION PLAN

Major Issue

1. **Inadequate Emergency Response Times**
Emergency response time to the most remote parcel (estimated at 4.4 miles) is 8.13 minutes per NFPA 1142 Table C.1.11(b) and about 9 minutes per Google Map. For parcels less than 2 acres, the County General Plan mandates a travel time of 5 minutes or less.
2. **Fire Protection Service**
The FPP does not adequately identify how the project will contribute to the on-going impact of 200+ homes on staffing needs – for the life of the project, and fire station construction.
3. **Secondary Access Requirement**
The project does not meet the standards for secondary access set forth in Title 14 section 1273.09 or County Fire Code section 902.2.2.8.

The following are the County Fire Marshal's Office comments in response to a Fire Protection Plan (FPP) dated October, 2006, by FireWise 2000, Inc. Please make the revisions listed above, and submit the revised Fire Protection Plan to the County of San Diego Department of Planning and Land Use, County Fire Marshal. **Submit two copies: a strikeover/highlighted revision and a clean revision** so we may accurately and expeditiously track all changes.

1. Again, as stated at the beginning of this letter, at least three major issues are apparent from review of the FPP. These issues are discussed further below.
 - Emergency response time to the most remote parcel (estimated at 4.4 miles) is 8.13 minutes per NFPA 1142 Table C.1.11(b) and about 9 minutes per Google Map. For parcels less than 2 acres, the County General Plan mandates a travel time of 5 minutes or less.
 - The FPP does not adequately identify how the project will contribute to the on-going impact of 200+ homes on staffing needs – for the life of the project, and fire station construction.
 - Secondary access is not adequately addressed.

2. Page 1, General Description. Please insert the word "general" before "area burned in the disastrous Harmony Grove Fire...", or delete the reference to the Harmony Grove Fire. State maps show, confirmed by our recollection, that the 1996 Harmony Grove Fire burned west of the proposed project, and not on site. (The Del Dios Fire in 1997 did burn the southern portion of the project site.)
3. Secondary Access. The narrative states that "*with two access points to Country Club Drive, adequate access is provided.*" We do not agree that Title 14 section 1273.09 or County Fire Code section 902.2.2.8 is met. Based on our observations, the last opportunity to access or evacuate in two remote directions is at Country Club Drive and Harmony Grove Road. (Country Club Drive and its tributaries south of Harmony Grove intersection do not have a second way out of the area.) The rough distance from lot 174 to that intersection is 3200 feet. For this size lots, the threshold for secondary access is substantially exceeded. The text refers to a water maintenance road to the east and cautions against using it. We ask for revision of the design (road design and fuel modification along it) and of the text to address the need for secondary access. We would expect to see development of this or alternative solutions to an extent that it fully met the fire code, and where it would be reasonable for secondary access or evacuation under most circumstances.
4. Reference last paragraph. Approval of the FPP must occur prior to approval of the Tentative Map, not "prior to any construction."
5. Further, the project receives fire protection services through a County Service Area (CSA 107). The County Fire Marshal – County Fire Services Coordinator is the "Fire Authority Having Jurisdiction" and is solely responsible for tentative map evaluation for fire conditions, FPP approval, and building plan approval. The Elfin Forest Harmony Grove Volunteer Fire Department provides valuable input during the review process, but only has an advisory role. Please the modify text.
6. Page 2, code reference. Please identify the source of the term "California Department of Forestry and Fire Protection Consolidated Fire Code". We believe "Consolidated Fire Code" refers to the 2001 County Fire Code (County Ordinance 9397, effective November 16, 2001, superseded by Ordinance 9669, the County Fire Code. Please add reference to another applicable code: California Code of Regulations Title 14 "SRA Fire Safe Regulations".
7. Page 14, On-site fire hazard and risk assessment. (fuel modification, landscaping and construction) states: "...should *more than mitigate any wildfire risk and loss of any of the 216 planned homes* ..." We disagree. The construction, access and fuel modification requirements mandated by the County Fire Code, the County Building Code and outlined in the Fire Protection Plan

may significantly reduce the risk, but language “*any wildfire risk*” and “*loss of any homes*” gives the false impression that risk is eliminated. Please soften the claim so as to not give a false sense of safety.

8. Pages 18, 19 & Fuel Treatment Location Map, Fuel modeling data. The FPP “Fuel treatment Location Map” indicates fuel models AFTER annual treatment. We expect the FPP to indicate the exposure BEFORE treatment, which also indicates probable appropriate fuel model if zone was modified, then annual modification not conducted, and fuels reverted.

Fire Behavior Calculations did not include Santa Ana winds with Fuel Model 4. We consider that to be the most significant exposure on the east and northeast portions of the project. A portion of the area burned in the 1997 Del Dios fire, but that short term modification does not change the fuel expected to repopulate the hillsides over time.

9. Construction standards. The FPP narrative references non-combustible exterior and no venting at the eaves. This is an element in County Fire and Building Code language for “enhanced” construction. We concur with the FPP consultant’s recommendation of enhanced construction throughout the tract, regardless of distance to nearest property line. Given the parcel sizes, “enhanced” construction would be required. Please remove the phrase “on the side of each structure facing native vegetation” (qualifier doesn’t apply to “enhanced” construction)
10. Page 20. Regarding the discussion of “preliminary SIAM results” on page 20, we do not support the assertion that fuel management greater than 100 feet is inconsequential (referencing Jack Cohen.) Please either remove the reference, or add a statement that the “*Department of Planning and Land Use, County Fire Marshal staff does not support this contention, based on their experience in wildland fires in this County.*”
11. Page 21, Fire department response time. Distance to Elfin Forest Harmony Grove fire station quoted is measured from the portion of the project closest to the station. We expect the measurement to be made from the furthest parcel created by the tract map. Our measurements are closer to 4.4 miles to lot 49 or 174. Travel time by several methods of calculation exceeds 5.0 minutes, as required by the County General Plan for parcels less than two acres.
12. The FPP makes reference to an adjacent proposed project as providing a fire station. It makes no mention of how this project would contribute to that station, equipment and staffing, nor how the deficiency would be dealt with if the adjacent project failed, or was constructed after this project.

13. Page 22. The FPP proposes “permanently irrigated” zone 2 – from 50 to 100 feet from structures. Although not a fire code issue, we frequently hear of concern from the U.S. Fish and Wildlife Service for irrigation water in proximity to environmentally sensitive areas. It may be worth discussing the issue with them and crafting an alternative to irrigation in this zone.
14. Page 25, Section 5.2.5 repeats County Fire and Building Code requirements for Wildland Urban Interface areas. Is it the consultant’s recommendation that the wood siding exception be utilized in this project, with it’s homes in close proximity to each other, and wildland exposure on several sides? Please clarify.
15. Page 26, Item 7. Please remove the last phrase: “*or protected by an approved automatic fire sprinkler system*”.
16. Item 8. This is a mix of “basic” and “enhanced” requirements. Because of parcel size, the entire project is “enhanced”, and skylights must be tempered glass or class A assemblies. (see Building Code section 704A.2.2 and Fire Code section II-A 26.3.7.) Please revise text.
17. Page 27, 5.2.6 Water Supply. County Fire Code requires a fireflow of 2500 GPM in wildland fire areas. Please revise text.
18. Page 28 – 29. The first paragraph references a new fire station being proposed as a condition of the adjacent project. How does this project propose contributing to that station, equipment and staffing? What is proposed for resolving the General Plan non-conformance issues should the New Urban West project not be approved, or if approved, not be constructed concurrently?
19. The FPP fails to discuss how this project is contributing to the operation of the volunteer fire department (CSA 107). The original “Preliminary Fire Conditions” for the Project Facility Availability Form dated April 28, 2005, identified an estimated 50% increase in the number of residents served over the current number, and identified a decline in service if the impact were not mitigated.

The second paragraph of 5.2.9 quotes the benefit fee currently assessed, but does not propose participation in a Mello Roos or County Facility District to mitigate the ongoing staffing impact. The FPP should propose a CFD or Mello Roos or similar means of mitigating the impact in perpetuity.
20. Page 29, 5.3 “Recommendations for Inclusion in the CC&Rs”. When stated simply as a “recommendations”, the comments carry no weight. Please change to “Requirements for Inclusion in the CC&Rs”

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**ATTACHMENT H
HYDROLOGY AND WATER QUALITY
(Includes Drainage, Flooding, Revised SWMP and Preliminary Grading Plan)**

The CEQA Drainage Study, Stormwater Management Plan, and Preliminary Grading Plan for the above project, received October 20, 2006 were reviewed by the Department of Public Works. The following are our comments:

CEQA DRAINAGE STUDY:

- What measures are in place to mitigate the increase of flow of 165 cfs in the post-development condition? Please provide the proper analysis in the CEQA Drainage Study with revisions to the Conclusion and narrative.
- The Harmony Grove Village Project (north and south of Harmony Grove Road), by New Urban West and Rick Engineering, reflect revisions to the floodplain of Escondido Creek. What additional effects on the floodplain will occur with the inclusion of the bridge over the Escondido Creek? Please coordinate with Rick Engineering and provide a floodplain / hydraulic analysis of the Escondido Creek with the inclusion of the proposed bridge on Country Club Drive. Attachment 'D' (100-year flood line of inundation calculations) was not included in this drainage submittal.
- Please label all nodes on the existing and proposed conditions exhibits as provided in the rational method hydrology analysis.
- Please show all proposed drainage outfall locations on the proposed conditions exhibit.
- Please provide the soils hydrologic group exhibit as part of the drainage report. Please include an overlay of the project on the hydrologic soils exhibit, with proper labeling on the legend.
- The existing and post-development conditions drainage map should include legible elevations, nodes that reflect the rational method analysis, flowrates at the end of outfalls, areas of each sub-basin, and description/location of the proposed bridge.
- Attachments 'B' and 'C' should reflect time of concentration and peak flows based on the confluence procedure as indicated in Section 3.4.2 of the San Diego County Hydrology Manual. Please revise calculations accordingly.

STORMWATER MANAGEMENT PLAN:

- Delineate the tributary areas to each post-BMP on Figure 5 as indicated on the numeric sizing table within Attachment E.
- Change Category 3 to Category 2 Maintenance for the use of Baysavers on page 22.
- What are the treatment flow capacities of the grass swales?

- On the post-construction BMP Exhibit, please provide legible elevations and contour lines. Please label the required treatment flow and treatment flow capacities of the Baysavers on the exhibit.
- The certificate sheet on attachment G should be signed by a Registered Civil Engineer.
- Please make all applicable changes to the SWMP Report based on revisions to the CEQA Drainage Study.

PRELIMINARY GRADING PLAN:

- Show direction of all Lot and Street drainage.
- Diversion of drainage area (Lots west of Lot 'J') has been identified. No diversions of drainage area are allowed. Project re-design is required. (2nd request)

If you have any questions regarding these comments, please contact Greg Carlton at (858) 495-5495.

ATTACHMENT I LAND USE AND PLANNING

General Plan Amendment Report (GPAR)/ Specific Plan

The project manager, Bill Stocks, has completed review of the GPAR/ Specific Plan and has identified the following Major Issues:

1. No progress has been made in determining the availability of sewer facilities to serve the project.
2. The Harmony Grove Village Specific Plan was recently approved by the Board of Supervisors. This project establishes a land use pattern for the Harmony Grove area with a Village Core surrounded by single-family residential development that decreases in density as distance from the Village Core increases. In addition, the project site is adjacent to the east of the approved Equestrian Ranch. It does not appear that the design of Harmony Grove Meadows has taken into account these recently approved land uses. In particular, the minimum 4000 square foot lots would not be compatible with the approved Equestrian Ranch.
3. The project proposes extensive design guidelines and special development regulations that will require implementation through a Major Use Permit.

Staff also has numerous editorial corrections. Please provide a CD of the document so that corrections can be made as expeditiously as possible.

If you have any questions regarding these comments, please contact the project manager, Bill Stocks, at (858) 694-3913 or email William.Stocks@sdcounty.ca.gov .

For additional comments from DPW staff please refer to Attachment O.

Vesting Tentative Map

Aside from the concerns over the proposed density noted above, staff has noted that the design of the subdivision will require a number of waivers from the lot design requirements set forth in Section 81.401 of the Subdivision Ordinance. These are primarily from the lot width requirements. In order to avoid listing on the Tentative Map each requirement and every lot that requires the waiver, the Implementation Section of the Specific Plan could address each of the requirements and explain generally why modified requirements should be allowed.

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No comment at this time.

**ATTACHMENT J
MINERAL RESOURCES**

Jim Bennett, staff geologist, has completed review of the Preliminary Geotechnical Investigation, Harmony Grove Meadows, dated July 26, 2006, prepared by Geotechnics, Inc. The report is adequate.

ATTACHMENT K NOISE

Staff has completed the review of the Harmony Grove project and the Noise Analysis report prepared by Recon received on October 20, 2006. Staff recommends additional information and minor edits to the analysis and documentation.

1. On the Noise Analysis report prepared by Recon, please document the percentage used, for the input traffic data associated with the traffic model (Stamina). Currently, future traffic vehicle data entered for Harmony Grove Road is 1032. Input traffic data, 1032, is 6.4% of 16,092 ADT (2030 ADTs Table 1). Staff has found that the noise analysis is taking 6.4% of the future 2030 traffic ADTs which is entered into the traffic model. Please document the percentage used to calculate the input traffic data, which is entered into the traffic model. Document the percentages used from both Harmony Grove and Country Club roadways. This can be addressed in Section 2.3.1, below Table 1.
2. On the Noise Analysis report prepared by Recon, Receptor 1 on Lot 2 and Receptor 2 on Lot 3 are calculated to have sound levels as high as 60 dBA CNEL. Figure 5 illustrates the receptor locations. It is difficult to determine the location of modeled Receptors 1 & 2 in relation to proposed residential Lots 2 & 3 utilizing Figure 5. Since these values are projected to be 60 dBA CNEL, please provide a small discussion addressing Receptor 1 & 2's location. Discuss and determine whether the 60 dBA CNEL is located in a significant portion of these lots. Ensure that noise sensitive land uses such as backyards, are not impacted by 60 dBA CNEL.
3. On the Noise Analysis report prepared by Recon, page 14, Section 4.2 Construction Analysis, include additional sample sources of construction noise. Currently, the Noise Analysis calculates construction noise impacts from the centroid of the project area. Please provide additional (2-3) samples throughout the project. Discuss a worst-case scenario, utilizing high noise level construction equipment. Provide their level of activity and distance relative to noise sensitive receptors and property lines.
4. On the Noise Analysis report prepared by Recon, page 14, Section 4.2 Construction Analysis, please include a property line noise level discussion. Currently, analysis states that construction levels are not projected to exceed the County's noise ordinance standard at sensitive receptors. County property line sound level limits shall be addressed. Refer to page 6, Section 2.1.2. c). It is unlawful to operate any construction equipment at the property line of any property upon which legal dwelling unit is located an average sound level greater than 75 dBA. The proposed construction noise shall also meet County property

line standards. Provide evidence that the construction noise will meet the County property line standard of an average sound level no greater than of 75 dBA.

ATTACHMENT L
POPULATION AND HOUSING – GROWTH INDUCTION ANALYSIS

This submittal did not include information on this subject area. This subject will be addressed in the EIR.

ATTACHMENT M
PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

This submittal did not include information on this subject area. This subject will be addressed in the EIR.

**ATTACHMENT N
RECREATION**

The discussion on this subject area was included in the GPAR/ Specific Plan Text (See Attachment I).

ATTACHMENT O TRAFFIC IMPACT ANALYSIS

The Department of Public Works has reviewed the following documents regarding the proposed Harmony Grove Meadows development:

- 1) General Plan Amendment Report/Specific Plan prepared by Latitude 33 Planning and Engineering revised October 2006
- 2) Traffic study prepared by Darnell & Associates dated October 19, 2006.

The following are our comments:

GENERAL PLAN AMENDMENT REPORT/SPECIFIC PLAN (GPA/SP REPORT):

- The project proposed to delete Country Club Drive (SC 1375). The GPA/SP Report should identify the specific road segment (from-to) that is proposed to be deleted. In addition, map figures should be provided that illustrated the adopted and proposed Circulation Element Plan.
- The GPA/SP Report provides (Pgs. 17 & 30) a list of reasons why Country Club Drive (SC 1375) can be deleted from the Circulation Element Plan. Although the list of reasons may be valid, the project's Traffic Study should provide analysis that documents that SC 1375 can be deleted without have a negative impact on the County's future roadway system. A Plan-to-Plan analysis and comparison of the "with" and "without" SC 1375 should be provided.
- The project applicant/consultant should coordinate with the DPW Traffic Section in the development of the project's Landscaping/Street Scene Plan (Pg.98) for any proposed landscaping within/along public road right-of-way. The plan should ensure that landscaping will be located outside/beyond the minimum clear recovery zone from the face of curb and will not create an obstruction at the edge of the travel way. Figure 10-8 appears to show trees that would be located very close (within five feet) to the curb line along Country Club Drive, which may not provide a sufficient clear zone space.
- The GPA/SP Report indicates (Pg.98) that trees will be located within the right-of-way along Country Club Drive. The GPA/SP Report should identify who will be responsible for the maintenance of the landscaping of the trees located within the right-of-way along Country Club Drive.
- The GPA/SP Report should note that trees/vegetation planted within the right-of-way must maintain adequate lines of sight and sight distance along the roadways.
- The County does not currently have adopted landscape placement guidelines as it relates to roadways (separation of travel way lanes and vegetation). The City of San Diego's landscape guidelines should be followed/referenced in developing the project's landscape plan.

- If landscaping will be located within the public road right-of-way, the Traffic Study should state that it would be evaluated for traffic safety concerns.

TRAFFIC STUDY:

- The Project Description (Pg.3) should note that a GPA is proposed and identify the Circulation Element changes (i.e. SC 1375 deletion) proposed by the project.
- The Roadway Characteristics Section (Pg.8) should include Country Club Drive, Del Dios Highway, and Nordahl Road, which are identified as being impacted by the proposed project.
- The Traffic Study should elaborate on the discussion on how the project's trip distribution assumptions were derived. The Traffic Study should clarify if a Select Zone assignment was used/referenced in order to develop the trip distribution assumptions.
- In August 2006, the County Board of Supervisors endorsed the GP 2020 road recommendations. The TIS should discuss the GP 2020 recommendations for Country Club Drive (SF 1375) south of Del Dios Highway. The Traffic Study should discuss how the GP 2020 recommendations may affect the conditioning of the proposed project and the ultimate road improvements, widths, and dedications.
- The Traffic Study should reference the County's updated/adopted Significance Criteria/Traffic Impact Guidelines (Pg.22) dated September 26, 2006.
- The Traffic Study indicates (Pg.38) that modifications were made to the Year 2030 traffic volumes in order to be consistent with the Harmony Grove Village Traffic Study. The Traffic Study should specify what modifications were made to the Year 2030 traffic volumes.
- The Traffic Study indicates (Pg.38) that SANDAG model used for the traffic analysis includes the proposed General Plan 2020 land uses. The Traffic Study should clarify those are the identical GP 2020 land use assumptions that were the basis of the GP 2020 roadway network that was endorsed by the Board of Supervisors in August 2006.
- The Traffic Study identifies (Pg.42) three roadway segments and two intersections that are directly impacted by the proposed project. The Traffic Study only identifies fair-share and TIF contributions to mitigate the direct impacts which alone will not fully mitigate direct impacts. The Traffic Study must recommend road improvements that will fully mitigate the project's direct impacts. Significant unmitigated traffic impacts to roadway segments and intersections will require a statement of Overriding Findings for project approval.
- The Traffic Study should better document, to the extent possible, that all feasible mitigation measures have been proposed to address the project's significant traffic impacts and that any additional mitigation requirements are infeasible and beyond the scope and control of the proposed project.

- Operational issues along Country Club Drive, Harmony Grove Road, and Del Dios Highway should be assessed and discussed (see EIR's for Harmony Grove Village and Cielo Del Norte).
- The Traffic Study should verify that the cumulatively impacted roadway segments identified on page 43 are County TIF roadway facilities. Only cumulative impacts to County TIF roadway facilities can be mitigated via participation in the County's TIF Program.
- The Traffic Study should verify that the cumulative assessment is based on currently built roadway system and officially scheduled/funded near-term roadway improvements such as the Citracado Parkway connection from Vineyard Avenue to Andreason Drive.
- The Traffic Study identifies (Pg.43) several proposed fair-share contribution towards intersection improvement projects in order to mitigate the project's significant cumulative impacts. The Traffic Study should verify that there are scheduled/established intersection improvement projects that are eligible to receive a fair-share contribution.
- A conceptual striping and signing plan should be provided for all proposed roadway segment and intersection improvements identified in Section VII (Pg.42).
- The design speed for a non-Circulation Element road is 30 mph and not the 25 mph identified on pages 41 and 42. The design speed information should be revised accordingly and the sight distance requirements should be revised to reflect the 30 mph design speed.
- The Traffic Study should include a summary table that identifies all of the project's significant direct or cumulative impacts and their corresponding recommended mitigation measures. The Traffic Study should indicate whether or not all of the project's significant impacts will be fully mitigated by the recommended mitigation measures.
- The Traffic Study indicates (Pg.44) that a traffic signal is required at the Harmony Grove Road/Country Club Drive intersection. The Traffic Study should provide a traffic signal warrant analysis to justify the proposed signal.
- The proposed project results in a cumulative impact to the Harmony Grove Road/Country Club Drive intersection. The project should be conditioned to construct the traffic signal or pay a fair-share contribution towards a scheduled improvement project. The signal warrant analysis should determine when the traffic signal at Harmony Grove Road/Country Club Drive intersection needs to be installed. In addition to the signalization, lane reconfiguration will be required at the at Harmony Grove Road/Country Club Drive intersection. The Harmony Grove Village project has identified a proposed lane reconfiguration as part of their project's required mitigation measures.
- The TIA should clearly identify the project's long-term significant traffic impacts to the adopted General Plan. The TIA should recommend mitigation measures for the project's long-term significant traffic impacts. The project is processing a General Plan Amendment, which requires the project to ensure that any proposed

increases in density or intensity of uses will not prevent the planned Circulation Element road system from operating at its planned LOS at buildout.

If you have any questions regarding these comments, please contact Nick Ortiz at (858) 874-4204.

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ATTACHMENT P
ESTIMATED PROCESSING SCHEDULE

**ATTACHMENT Q
PRELIMINARY DPW REQUIREMENTS**

THE FOLLOWING PRELIMINARY COMMENTS ARE BASED ON AN OFFICE REVIEW AND/OR A FIELD REVIEW BY DPW FOR REPLACEMENT PLANS RECEIVED 10/20/06, AND MAY BE REVISED UPON FURTHER REVIEW AND INPUT FROM OTHER AGENCIES.

THESE CONDITIONS REPLACE OUR DRAFT REQUIREMENTS OF JULY 5, 2005.

COMMENTS:

- **MAJOR ISSUE:** The project is required to construct offsite road improvements / bridge improvements over Escondido Creek. Construction of these improvements will result in substantial cost and require additional environmental study. The project proponents must provide evidence of the ability to dedicate required right-of-way for required off-site road improvements with the appurtenant slopes and drainage for these facilities.
- Pending evaluation and approval of the project's CEQA Drainage Study and Stormwater Management Plan, further improvements may be required to the surrounding area as mitigation for drainage impacts caused by this project.
- Pending evaluation and approval of the project's Traffic Study, further offsite improvements will be required to the surrounding area as mitigation for traffic impacts caused by this project. Comments on the Traffic Study received October 20, 2006 are forthcoming.
- The Traffic Study proposes mitigation by payment of the County's Traffic Impact Fee (TIF) for direct impacts within other jurisdictions (City of Escondido, Caltrans, etc.) and for intersections. The County's TIF Program can only be used to mitigate roadway *segments* within the County. Fair share payments can only be used as mitigation, where an official, approved project exists.
- Revise Tentative Map and Typical Sections to reflect conditions as stated below.
- Pending CALTRANS, City of San Marcos, and City of Escondido review and comment, further improvements may be required to the surrounding area as mitigation for impacts caused by this project.
- Pending review of this project's Specific Plan and General Plan Amendment, further improvements may be required to the surrounding area as mitigation for impacts caused by this project.

- Pending review and comment from the Fire District, additional secondary access and further roadway design changes may be required.
- Substandard horizontal radii are shown on Streets 'C', 'H', and 'K'. All proposed roadway horizontal radii shall meet the minimum requirements of the Public and Private Road Standards. Please revise Vesting Tentative Map accordingly.
- Diversion of drainage area (Lots west of Lot 'J') has been identified. No diversions of drainage area are allowed. Project re-design is required.

THE FOLLOWING CONDITIONS OF APPROVAL MAY REQUIRE SIGNIFICANT CHANGES TO THE MAP AND MAY INCLUDE ELIMINATION OF LOTS AS SHOWN ON THE TENTATIVE MAP:

PLANS AND SPECIFICATIONS

(Street Improvements and Access)

1. Standard Conditions 1 through 10 and 12.
2. Specific Conditions:
 - a. Prior to approval of the Final Map, improve or agree to improve and provide security for **Country Club Drive (SC 1375)**, from Harmony Grove Road to the westerly property boundary in accordance with Public Road Standards for a Collector Road, to a graded width of eighty-four feet (84') from centerline and an improved width of sixty-four feet (64') from centerline with asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk, with face of curb at thirty-two feet (32') from centerline to the satisfaction of the Director of Public Works.
 - b. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'B'**, from Country Club Drive to Street 'C' in accordance with Public Road Standards for a Residential Collector, to a graded width of sixty feet (60') with forty feet (40') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at twenty feet (20') from centerline to the satisfaction of the Director of Public Works.
 - c. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'C'**, from Street 'B' to Street 'D' in accordance

with Public Road Standards for a Residential Collector, to a graded width of sixty feet (60') with forty feet (40') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at twenty feet (20') from centerline to the satisfaction of the Director of Public Works. Minimum horizontal radius shall be three hundred feet (300').

- d. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'C'**, from Street 'B' to the cul-de-sac at Lot 2, in accordance with Public Road Standards for a Residential Cul-de-sac, to a graded width of fifty-two feet (52') with thirty-two feet (32') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at sixteen (16') from centerline to the satisfaction of the Director of Public Works.
- e. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'A'** in accordance with Public Road Standards for a modified Residential Collector, to a graded width of one hundred forty-five feet (145') with forty feet (40') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk to the satisfaction of the Director of Public Works (typical section as shown on the approved Tentative Map).
- f. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'D'**, from Street 'A' to Street 'C' in accordance with Public Road Standards for a Residential Collector, to a graded width of sixty feet (60') with forty feet (40') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at twenty feet (20') from centerline to the satisfaction of the Director of Public Works.
- g. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'D'**, from Street 'C' to the cul-de-sac at Lot 49, in accordance with Public Road Standards for a Residential Cul-de-sac, to a graded width of fifty-two feet (52') with thirty-two feet (32') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at sixteen feet (16') from centerline to the satisfaction of the Director of Public Works.
- h. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'D'**, from Street 'A' to Street 'C', in accordance with Public Road Standards for a Residential Collector, to a graded width of sixty feet (60') with forty feet (40') of asphalt concrete pavement over

approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at twenty feet (20') from centerline to the satisfaction of the Director of Public Works.

- i. Provide a standard **street knuckle** in accordance with Regional Standard Drawing DS-15 for '**D**' **Street at Lot 30** to the satisfaction of the Director of Public Works.
- j. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'F'**, from Street 'C' to Street 'J', in accordance with Public Road Standards for a Residential Cul-de-sac, to a graded width of fifty-two feet (52') with thirty-two feet (32') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at sixteen feet (16') from centerline to the satisfaction of the Director of Public Works.
- k. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'G'**, from Street 'C' to Street 'J', in accordance with Public Road Standards for a Residential Cul-de-sac, to a graded width of fifty-two feet (52') with thirty-two feet (32') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at sixteen feet (16') from centerline to the satisfaction of the Director of Public Works.
- l. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'E'**, in accordance with Public Road Standards for a Residential Cul-de-sac, to a graded width of fifty-two feet (52') with thirty-two feet (32') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at sixteen feet (16') from centerline to the satisfaction of the Director of Public Works.
- m. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'H'** in accordance with Public Road Standards for a Residential Cul-de-sac, to a graded width of fifty-two feet (52') with thirty-two feet (32') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at sixteen feet (16') from centerline to the satisfaction of the Director of Public Works. Minimum horizontal radius shall be two hundred feet (200').
- n. Prior to approval of the Final Map, improve or agree to improve and provide security for **Street 'I'** in accordance with Public Road Standards for a Residential Cul-de-sac, to a graded width of fifty-two feet (52') with

thirty-two feet (32') of asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk with face of curb at sixteen feet (16') from centerline to the satisfaction of the Director of Public Works

- o. Street 'C', Street 'H', Street 'I', Street 'D', and Street 'E' shall each terminate with a **cul-de-sac** graded to a radius of forty-eight feet (48') and surfaced to a radius of thirty-eight feet (38') with asphalt concrete pavement over approved base with Portland cement concrete curb gutter and sidewalk with face of curb at thirty-eight feet (38') from the radius point.
- p. Street 'F' and Street 'G' shall terminate in a **cul-de-sac** graded to a radius of thirty-eight feet (38') and improved with asphalt concrete to a radius of thirty-six feet (36'), **or a hammerhead turnaround** shall be graded and improved with asphalt concrete, to the satisfaction of DPLU Fire and the County of San Diego, Director of Public Works.
- q. Prior to approval of the Final Map, improve or agree to improve and provide security for the private easement road, **Street 'K'**, from Street 'C' to Lot 216, to a graded width of twenty-eight feet (28') and to an improved width of twenty-four feet (24') with asphalt concrete pavement over approved base with Portland cement concrete curb, gutter, and sidewalk with face of curb at twelve feet (12') from centerline. The improvement and design standards of Section 3.1(C) of the County Standards for Private Streets for one hundred (100) or less trips shall apply to the satisfaction of the Director of Public Works
- r. Minimum horizontal radius for Street 'K' shall be one hundred feet (100').
- s. Street 'K' shall terminate in a **cul-de-sac** graded to a radius of thirty-eight feet (38') and improved with asphalt concrete to a radius of thirty-six feet (36'), **or a hammerhead turnaround** shall be graded and improved with asphalt concrete, to the satisfaction of DPLU Fire and the County of San Diego, Director of Public Works.
- t. Asphalt concrete surfacing material shall be hand-raked and compacted to form smooth tapered connections along all edges including those edges adjacent to soil. The edges of asphalt concrete shall be hand-raked at 45 degrees or flatter, so as to provide a smooth transition next to existing soil, including those areas scheduled for shoulder backing. The above shall be done to the satisfaction of the Director of Public Works.

- u. Adequate sight distance per County Standards shall be provided at all proposed intersections of to the satisfaction of the Director of Public Works.
- v. Where height of fill bank for a 2:1 slope is greater than twelve feet (12'); or where height of fill bank for a 1.5:1 slope is greater than ten feet (10'), guardrail shall be installed per CALTRANS standards to the satisfaction of the Director of Public Works.
- w. Unless stated otherwise, improve roads or agree to improve and provide security for them, with the recordation of the unit the road is within, abuts, or provides access to.

(Drainage and Flood Control)

- 3. Standard Conditions 13 through 18.
- 4. Specific Conditions:
 - a. The private storm drain system shall be privately maintained by a private maintenance mechanism such as a homeowners association or other private entity acceptable to the satisfaction of the Director of Public Works.
 - b. The 100-year flood line of the natural channels crossing all lots with drainage watersheds in excess of twenty-five (25) acres shall be clearly delineated on the non-title information sheet of the Final Map.
 - c. A flowage easement shall be granted to the San Diego County Flood Control District for those portions of all lots subject to inundation by a 100-year flood, from a drainage area in excess of one (1) square mile.

(Grading Plans)

- 5. Standard Conditions 19(a-e).
- 6. Specific Conditions:
 - a. Comply with all applicable stormwater regulations at all times. The activities proposed under this application are subject to enforcement under permits from the San Diego Regional Water Quality Control Board (RWQCB) and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance (Ordinance

No. 9424 and Ordinance No. 9426) and all other applicable ordinances and standards. This includes requirements for materials and wastes control, erosion control, and sediment control on the project site. Projects that involve areas 1 acre or greater require that the property owner keep additional and updated information onsite concerning stormwater runoff. This requirement shall be to the satisfaction of the Director of Public Works.

- b. All of the work described above pertaining to erosion control, irrigation system, slope protection, drainage systems, desilting basins, energy dissipators, and silt control shall be secured by an Instrument of Credit in a form satisfactory to County Counsel for an amount equal to the cost of this work as determined or approved by the County Department of Public Works. An agreement in a form satisfactory to County Counsel shall accompany the Instrument of Credit to authorize the County Department of Public Works to unilaterally withdraw any part of or all the Instrument of Credit to accomplish any of the work agreed to if it is not accomplished to the satisfaction of the County Department of Public Works by the date agreed. The cash deposit collected for grading, per the grading ordinance, will be used for emergency erosion measures. If said deposit collected for grading is less than \$5,000.00, the developer will supplement the deposit to equal \$5,000.00. The developer shall submit a letter to the County Department of Public Works authorizing the use of this deposit for emergency measures.

DEVELOPMENT IMPACT FEES

7. Specific Conditions:

- a. Deposit with the County Department of Public Works sufficient funds to cover the cost of inspection of the development improvements.

FINAL MAP RECORDATION

(Streets and Dedication)

8. Specific Conditions:

- a. With the Final Map, dedicate **Street 'B'**, from Country Club Drive to Street 'C', in accordance with Public Road Standards for a Residential Collector to a right-of-way width of sixty feet (60') together with right to construct and maintain slopes and drainage facilities to the satisfaction of the Director of Public Works.

- b. With the Final Map, dedicate **Street 'C'**, from Street 'B' to Street 'D', in accordance with Public Road Standards for a Residential Collector to a right-of-way width of sixty feet (60') together with right to construct and maintain slopes and drainage facilities to the satisfaction of the Director of Public Works.
- c. With the Final Map, dedicate **Street 'C'**, from Street 'B' to the cul-de-sac at Lot 2, in accordance with Public Road Standards for a Residential Cul-de-sac to a right-of-way width of fifty-two feet (52') together with right to construct and maintain slopes and drainage facilities to the satisfaction of the Director of Public Works.
- d. With the Final Map, dedicate **Street 'A'** in accordance with Public Road Standards for a modified Residential Collector to a right-of-way width of one hundred forty-five feet (145') together with right to construct and maintain slopes and drainage facilities to the satisfaction of the Director of Public Works.
- e. With the Final Map, dedicate **Street 'D'**, from Street 'A' to Street 'C', in accordance with Public Road Standards for a Residential Collector to a right-of-way width of sixty feet (60') to the satisfaction of the Director of Public Works.
- f. With the Final Map, dedicate **Street 'D'**, from Street 'C' to the cul-de-sac at Lot 49 in accordance with Public Road Standards for a Residential Cul-de-sac to a right-of-way width of fifty-two feet (52') to the satisfaction of the Director of Public Works.
- g. With the Final Map, dedicate **Street 'D'**, from Street 'A' to Street 'C', in accordance with Public Road Standards for a Residential Collector to a right-of-way width of sixty feet (60') to the satisfaction of the Director of Public Works.
- h. With the Final Map, dedicate **Street 'F'**, from Street 'C' to Street 'J', in accordance with Public Road Standards for a Residential Cul-de-sac to a right-of-way width of fifty-two feet (52') to the satisfaction of the Director of Public Works.
- i. With the Final Map, dedicate **Street 'G'**, from Street 'C' to Street 'J' in accordance with Public Road Standards for a Residential Cul-de-sac to a right-of-way width of fifty-two feet (52') to the satisfaction of the Director of Public Works.

- j. With the Final Map, dedicate **Street 'E'**, in accordance with Public Road Standards for a Residential Cul-de-sac to a right-of-way width of fifty-two feet (52') to the satisfaction of the Director of Public Works.
- k. With the Final Map, dedicate **Street 'H'**, in accordance with Public Road Standards for a Residential Cul-de-sac to a right-of-way width of fifty-two feet (52') to the satisfaction of the Director of Public Works.
- l. With the Final Map, dedicate **Street 'I'**, in accordance with Public Road Standards for a Residential Cul-de-sac to a right-of-way width of fifty-two feet (52') to the satisfaction of the Director of Public Works.
- j. With the Final Map, dedicate onsite, and cause to be granted offsite, **Country Club Drive (SC 1375)**, from Harmony Grove Road to the westerly property boundary, in accordance with Public Road Standards for a Collector, to a right-of-way width of eighty-four feet (84'), together with right to construct and maintain slopes and drainage facilities to the satisfaction of the Director of Public Works.
- k. The desired location of the centerline for **Country Club Drive (SC 1375)** must be determined, which is shown on the Circulation Element of the County General Plan as a Collector Road. The following shall be shown on the Final Map:
 - (1) The centerline location as approved by the Department of Public Works.
 - (2) Since Country Club Drive (SC 1375) is not required to be constructed to ultimate, the following shall be shown on the Final Map as "nontitle" information:
 - (a) The width of the right-of-way which is forty-two feet (42') from the centerline and identified by a line drawn at the appropriate location and labeled, "Limit of Proposed Street Widening."
 - (b) A building line which is sixty-two feet (62') from the centerline of the road, identified by a line drawn at the appropriate location and labeled, "Limit of Building Line."
 - (c) Show the ultimate slopes and drainage facilities on the Final Map. A profile and cross-sections sufficient to verify these

limits shall be submitted to the Department of Public Works for review and approval.

- I. Because private roads are approved as a condition of this subdivision, the following shall apply:
 - (1) Maintenance shall be provided through a private road maintenance agreement satisfactory to the Director of Public Works.
 - (2) The Director of Public Works shall be notified as to the final disposition of title (ownership) to XXXXX, and place a note on the Final Map as to the final title status of said-roads.
 - (3) Access to each lot shall be provided by private road easement not less than forty feet (40') wide.
- m. Prior to approval of improvement and/or grading plans, issuance of excavation permits, and issuance of any further grant of approval, the owners of this project will be required to sign a statement that they are aware of the County of San Diego, Department of Public Works, Pavement Cut Policy and that they have contacted all adjacent property owners and solicited their participation in the extension of utilities.
- n. Relinquish access rights into Country Club Drive except for Streets 'A' and 'B'.
- o. The Basis of Bearings for the Subdivision Map shall be in terms of the California Coordinate System Zone 6 NORTH AMERICAN DATUM OF 1983 by use of existing Horizontal Control. **To be in compliance with the Public Resources Code, all Subdivision Map surveys performed after January 1, 2000 must use a Basis of Bearings established from existing Horizontal Control Stations with first order accuracy.**
- p. If conducted prior to January 1, 2000, a survey for any Subdivision Map that is to be based on state plane coordinates shall show two measured ties from the boundary of the subject property to existing Horizontal Control station(s) having California coordinate values of Third order accuracy or better, as published in the County of San Diego's Horizontal Control book. These tie lines to the existing control shall be shown in relation to the California Coordinate System (i.e. Grid bearings and Grid distances). All other distances shown on the map are to be shown as ground distances. A combined factor for conversion of Ground-to-Grid distances shall be shown on the map, all to the satisfaction of the Director

of Public Works (Ref. San Diego County Subdivision Ordinance Section 81.506(j)).

If conducted after December 31, 1999, a survey for any Subdivision Map that is to be based on state plane coordinates shall show two measured ties from the boundary of the subject property to existing Horizontal Control station(s) having California Coordinate values of first order accuracy or better, as published in the County of San Diego's Horizontal Control book. These tie lines to the existing control shall be shown in relation to the California Coordinate System (i.e. Grid bearings and Grid distances). All other distances shown on the map are to be shown as Ground distances. A combined factor for conversion of Grid-to-Ground distances shall be shown on the map.

For purposes of this section, the date of survey for the field observed connections shall be the date of survey as indicated in the surveyor's/engineer's certificate as shown on the final map.

(Miscellaneous)

9. Standard Conditions 25, 26, 27, and 28.

WAIVER AND EXCEPTIONS

These recommendations are pursuant to the provisions of the State Subdivision Map Act, the County Subdivision Ordinance, the County Public Road and Private Road Standards, and all other required ordinances of San Diego County except for a waiver or modification of the following:

- a. Standard Conditions for Tentative Maps:
 - (1) Standard Condition 11: Said condition pertains to condominium units or a planned development. This subdivision is neither a condominium nor a planned development.
 - (2) Standard Condition 27.1: Said condition states that the Final Map may be filed as units or groups of units. The Final Map for this project is required to include the entire area shown on the Tentative Map and shall not be filed as units or groups of units.

If you have any questions regarding these conditions, please contact Greg Carlton at (858) 495-5495.



Dedicated to a continuing rural atmosphere

20223 Elfin Forest Rd., Elfin Forest, CA 92029

February 21, 2011

Honorable Chairman Bill Horn
County of San Diego Board of Supervisors
County Administration Center
1600 Pacific Highway, Room 335
San Diego, CA 92101

Re: Harmony Grove Meadows Referral SD7 in General Plan Update

Honorable Chairman Horn:

The Elfin Forest Harmony Grove Town Council wishes to comment on the letter from Latitude 33 dated December 6, 2010, requesting an upzone for the property mentioned above as part of the General Plan Update process.

First and foremost, as our previous letters to the Board and public testimony stated, we continue to be frustrated with increased density requests that are based solely on the economic benefit of a non-resident developer and not on the community plan or environmental situation or the commitment made to our community by County staff and the Board of Supervisors during the public approval process for the Harmony Grove Village Specific Plan. In our area two non-resident developers (banks at this point since both properties are in bankruptcy) – University Heights (SD8), and Harmony Groves Meadow (SD7) - are only trying maximize their own personal gain by asking your Board to grant significant additional residential density above the current General Plan.

Since Mr. Shaw submitted a letter to advocate for such an entitlement gift through the correspondence mentioned above, we wish to clarify the community's position and correct several misstatements. Our basic position can be summarized as follows:

- The proposed "compromise" is not consistent with existing community plan, current zoning on the property, and the hard fought compromise for the area
- Creeping sprawl would affect existing public investment in open space
- Environmental conditions are starkly different on the properties compared
- Critical public services such as sewer and emergency exit are not likely to be available to Mr Shaw's client

The basic argument made by Mr. Shaw on behalf of his non-resident client, Preferred Bank, is that since Harmony Grove Village is an approved SPA with a given density, his client nearby should be entitled to the same. Notwithstanding the fact that that the Harmony

2010 Board Members:

Melanie Fallon, Chair
Jacqueline Arsivaud-Benjamin, Vice-Chair
May Meintjes, Treasurer
Nancy Goodrich, Secretary
Eric Anderson
Bonnie Baumgartner
Minoo Sohaey

Grove Meadows project as proposed in the past was likely heading for denial at DPLU, and was never approved by any of the reviewing bodies, this argument fails to recognize the historical context of the Harmony Grove Village approval process.

As we have testified to in front of the Board of Supervisors, the decision not to oppose the Harmony Grove Village (HGV) project was one of the most divisive and difficult decision this Board and this community had to make back in 2007. I refer you to the February 8th, 2007 North County Times article covering the approval hearing (attached) where we clearly state that the only reason we were not opposing this massive development was that we trusted the Board to uphold the **Village Development Pattern (VDP)** throughout the valley, and restrict high urban density to the village core. The VDP provides for progressively less dense development the further from the core, and was the painstakingly negotiated compromise the community and County staff arrived at after five years of meetings, and adopted years ago by the residents of Harmony Grove, Elfin Forest, the San Dieguito Planning Group, the San Diego County Planning Commission, and County Staff.

We fully understand as a community that we need to take our “fair share” of growth in the County’s projected housing needs, and in fact with the approved HGV SPA, our community is slated to see a **176% increase in housing stock** during the time horizon of the new General Plan according to the GPU EIR. To further burden our small community of less than 500 homes with an increase beyond the 742 additional units of the approved HGV SPA is clearly way beyond any reasonable interpretation of “fair share”.

The argument that if the valley had been planned as a whole, surely the SD-7 project would have the same density as Harmony Grove Village, ignores the fact that in fact the entire valley *was* subject to an overall planning effort through a number of public workshops held by DPLU way before New Urban West was ever on the horizon, in the early 2000’s. The community was presented with a choice to place some of the density South of the creek, or all of the density north of the creek, and through several meetings, consensus was reached that all the proposed density should stay North of the creek. Two working maps of the area used in the workshops are attached as evidence of the thinking at the time. Now we count on the good faith from our elected officials to respect past compromises forged between staff and the community.

Since the proposed project is beyond the Village boundaries, the Staff recommendation of SR-2, SR-4 and RL 20 is entirely consistent with the compromise forged around the vision for the entire valley between community and staff. The 2005 General Plan Amendment referred to by Mr. Shaw (Case # GPA 05-004, SP 05-001, R 05-007, VTM 5403 RPL, and ER No. 05-08-013) was never approved, and was strongly opposed by the neighboring communities, the San Dieguito Planning Group, and County Staff. As such it can hardly be described as a reference point for a compromise, since it was only a developer’s pipe dream. What the referenced letter further fails to mention is the current entitlement on this property, which should be the starting point for any “compromise”. Current zoning for SD7 is 1du/4, 8, 20 acres, which would yield somewhere between 20 to 27 total units. according to DPLU (mail from Eric Lardy attached). The proposed Staff Recommended Map designation is very close to the current entitlements and would keep the project density to approximately 22 to 26 units on this 111 acres property which is the correct density given the topography and the adjacent land uses: estate homes on SR-4 to the North West, and RL20 to the West and East.

Furthermore, allowing a density increase from a maximum of 27 under current GP to the proposed 170 would severely compromise the significant public investment to date to maintain viable habitat for the gnatcatcher in the area. The lands directly adjacent to the East and to the West are preserved as part of the Elfin Forest/Harmony Grove Core Habitat Area where considerable public monies have been invested. The proposed project constitutes an unwarranted upzone which would degrade that investment with impacts to adjacent open space and degradation of the functionality of the existing Open Space, especially if considered in combination with another nearby referral, University Heights (SD8).

The Staff Recommended Map (and the Draft land Use Map) follows the **Village Development Pattern** for all areas in Harmony Grove, including existing residential areas, which have been downzoned to accommodate this pattern. All current and future residents of Harmony Grove are following this density pattern. Mr. Shaw has not presented a compelling case for making an exception for the Preferred Bank project.

Following is a response to each of Mr. Shaw's points (bolded text as in original).

First as a matter of factual correction, there are NO other SPAs in the Harmony Grove area, much less "**numerous other Specific Plans in the Harmony Grove area**" as noted in Mr. Shaw's letter. Further the proposed "compromise" may constitute "a **30%** reduction in density from the original 2005 application", which is irrelevant since that was only a developer's wish list, but it is in fact a **680% increase in density over the current entitlements**, which is the only relevant point of reference.

1) While not officially "pipelined," a formal application for the GPA, 2005 Specific Plan, Vested Tentative Map and Environmental Document were submitted in 2006. The pipeline was intended to last two years rather than six years. The application received multiple review cycles from the County and the majority of issues were successfully resolved. These historically challenging economic and financial circumstances have dictated a recent pause in project processing by the applicant. These circumstances are not unique to this project and the owner desires to redesign the VTM consistent with the Semi-Rural 0.5 and restart the entitlement process.

The statement that "*the majority of issues were successfully resolved*" is not accurate. Among other fatal flaws the project does not have service for sewer, nor secondary emergency exit (especially with acquisition of adjacent property for conservation since project application was terminated), no public access at all during flooding of the Escondido Creek, a reliable yearly occurrence, and does not conform to the land use pattern approved with the HCV SPA. These are some of the reasons the project was heading for denial prior to being abandoned, as stated in the Environmental Review Letter from DPLU dated March 2007, and these circumstances are indeed unique to this project.

2) Harmony Grove Meadows has similar topographic, environmental, and site characteristics as the adjoining Harmony Grove Village project, which was approved in 2007 for 742 residential units, as a Specific plan.

The environmental characteristics of both sites could not be any more different: the vast majority of the Harmony Grove Village (HGV) project is located North of the Escondido Creek on heavily impacted agricultural lands, while the proposed project has been surveyed as part of the MSCP process, falls within the PAMA due to the habitat quality, and

is nestled in between preserved open space parcels. The extract from the SANGIS MSCP map attached outlines high value habitat on over 80% of the proposed project parcel http://www.sangis.org/LibraryService/DownloadedFiles/lmscp_sh.jpg

3) The Harmony Grove Meadows project has similar lot sizes and densities as the Harmony Grove Specific Plan.

The HGV project was supported by surrounding residents and approved by the County because it has a pattern of density that decreases from the more urban core to rural multi-acre home sites at the outer edges, consistent with the **Village Development Pattern**. Because the Preferred Bank project is on the outskirts of the Village area, the densities should be considerably lower than those of the Village project and should conform with those specified in the Draft Land Use Map or the Planning Commission Map. Besides, the proposed project is located approximately a mile away from the core high density of HGV, on the other side of the creek and the public road, and the portion of the HGV project directly adjacent to the proposed project is an equestrian center on septic system.

4) The Harmony Grove Village project additionally provides for a sewer treatment facility in close proximity to our project.

The sewage treatment facility Mr. Shaw refers to is sized for the Harmony Grove Village project and cannot accommodate any more dwelling units (confirmed by Daniel Brogadir, County Wastewater Management). In addition, the Preferred Bank project is outside of the LAFCO-approved sewer district. The community has made its opposition to any expansion of the sewer district known to LAFCO officials. We feel that LAFCO understands and supports the community's position and that expansion of the sewage treatment facility or the sewer district to include the Preferred Bank project is highly unlikely.

5) While arguments have been made that the Harmony Grove area is "rural" in character, both the County and the local Community Planning Group supported the Harmony Grove Village project with lot sizes ranging from less than 3,500 square feet to just over 20,00 square feet. These densities and lot sizes are not rural in character.

The 3,500 sq ft densities are not rural in character, they are urban Village densities appropriately located within the Village core. The location of the Preferred Bank project is outside of the **Village limit line**, which is the boundary between urban and rural in the Harmony Grove area. Properties beyond this limit line cannot be provided with an urban level of density or public services.

6) The Harmony Grove Meadows project preserves the most sensitive environmental features of the site and provides protection from the steep slope and sensitive plant and animal habitat.

Thanks to our diligent County Supervisors, this is expected of any project that is brought forth in San Diego County.

7) The property's location is best defined as on the edge of Harmony Grove, especially considering the close proximity to the more urbanized County [sic] of Escondido and the recently approved Harmony Grove Village project.

We agree. The property's location on the edge of Harmony Grove qualifies it as being past the Village limit line and in the rural outskirts where higher densities cannot be accommodated. It is surrounded by RL20 lands.

8) *The property is not separated topographically from the Harmony Grove Village project by any major ridgelines or drainage basins. Instead, the property shares these features and is located immediately adjacent to the 742-dwelling unit project (see attached aerial photo).*

The subject property is immediately adjacent to the Village Equestrian Center portion of the Harmony Grove Village project, an area zoned for only 3 home sites on 35 acres... No portion of the Preferred Bank project is adjacent to any residential areas in the Specific Plan. The Preferred Bank project is beyond the Village limit line and outside of the sewer district, where only low rural densities can be properly serviced by public facilities. It is in fact separated from the HGV project's residential core by a creek.

9) *Designating a property as semi-rural 0.5 provides a comprehensive planning and design solution to a 111-acre site, with common open space, a trail system and preservation of steep slopes onsite.*

This could be a good plan if it were located in another community where it would not be **inconsistent with established planning guidelines**, where it would not be **beyond the Village limit line** and **outside of the sewer treatment district**, and where it would not have **the strong opposition of the residents and local county planning agencies**.

10) *Designating the property as a SPA allows the applicant to continue to working with the Community Planning Group, adjoining neighbors and City (sic) staff to design the most desirable project and resolve remaining issues.*

We see no compelling reason to extend any privileges to this applicant concerning this project. The stakeholders already designed the most desirable density allocation over the entire valley years ago, and the community demonstrated its commitment to sound planning by accepting a 176% increase in density over the current housing units, through the Harmony Grove Village SPA. The project has fatal flaws as described in the staff Environmental reviews, and should not use the General Plan Update process to get a gift of increased density which wrecks the carefully and painfully constructed planning framework between stakeholders.

Thank you for the opportunity to comment,

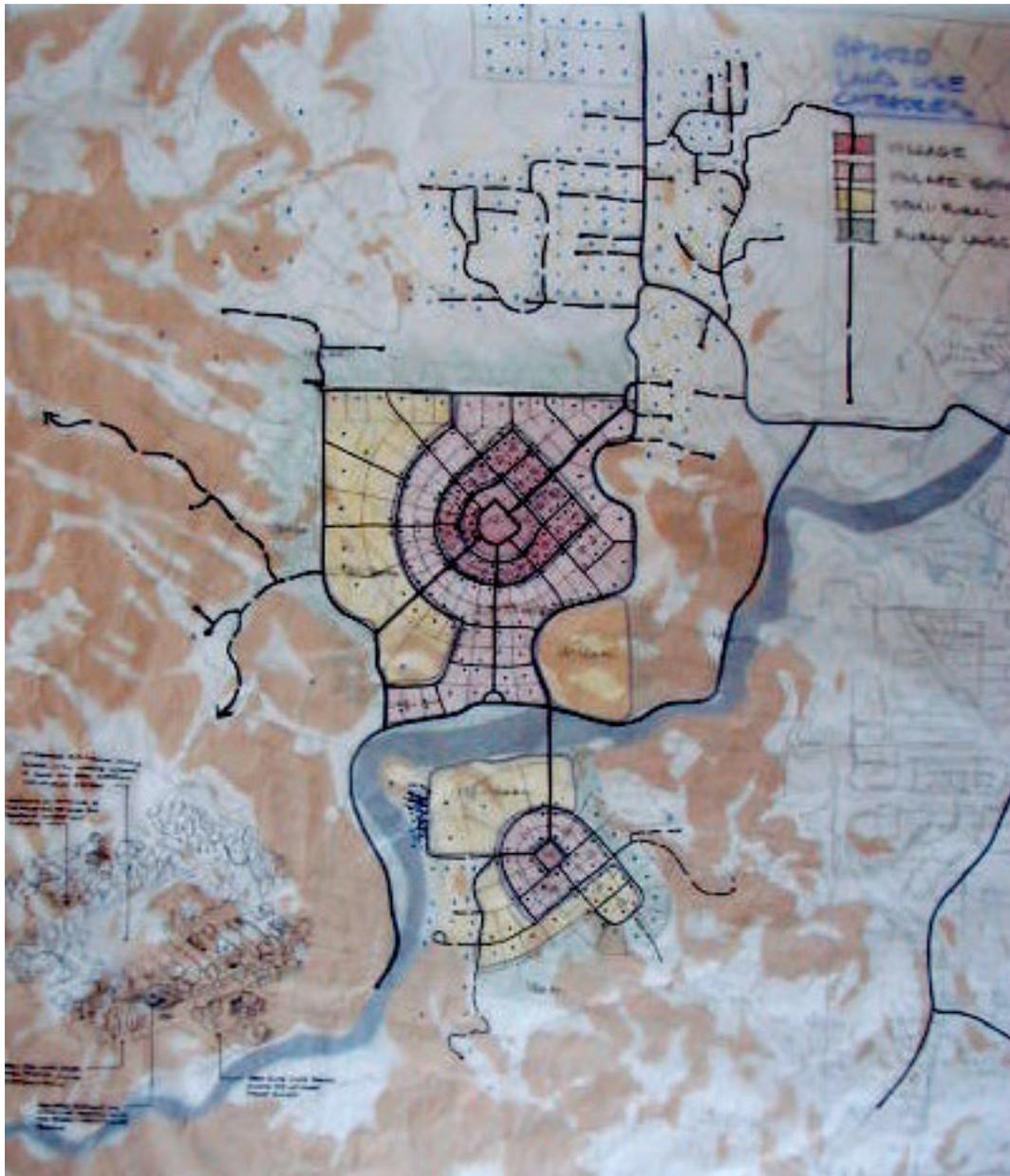


Melanie Fallon

Chair, Elfin Forest Harmony Grove Town Council

Attachments

Cc: County Supervisors
Devon Muto



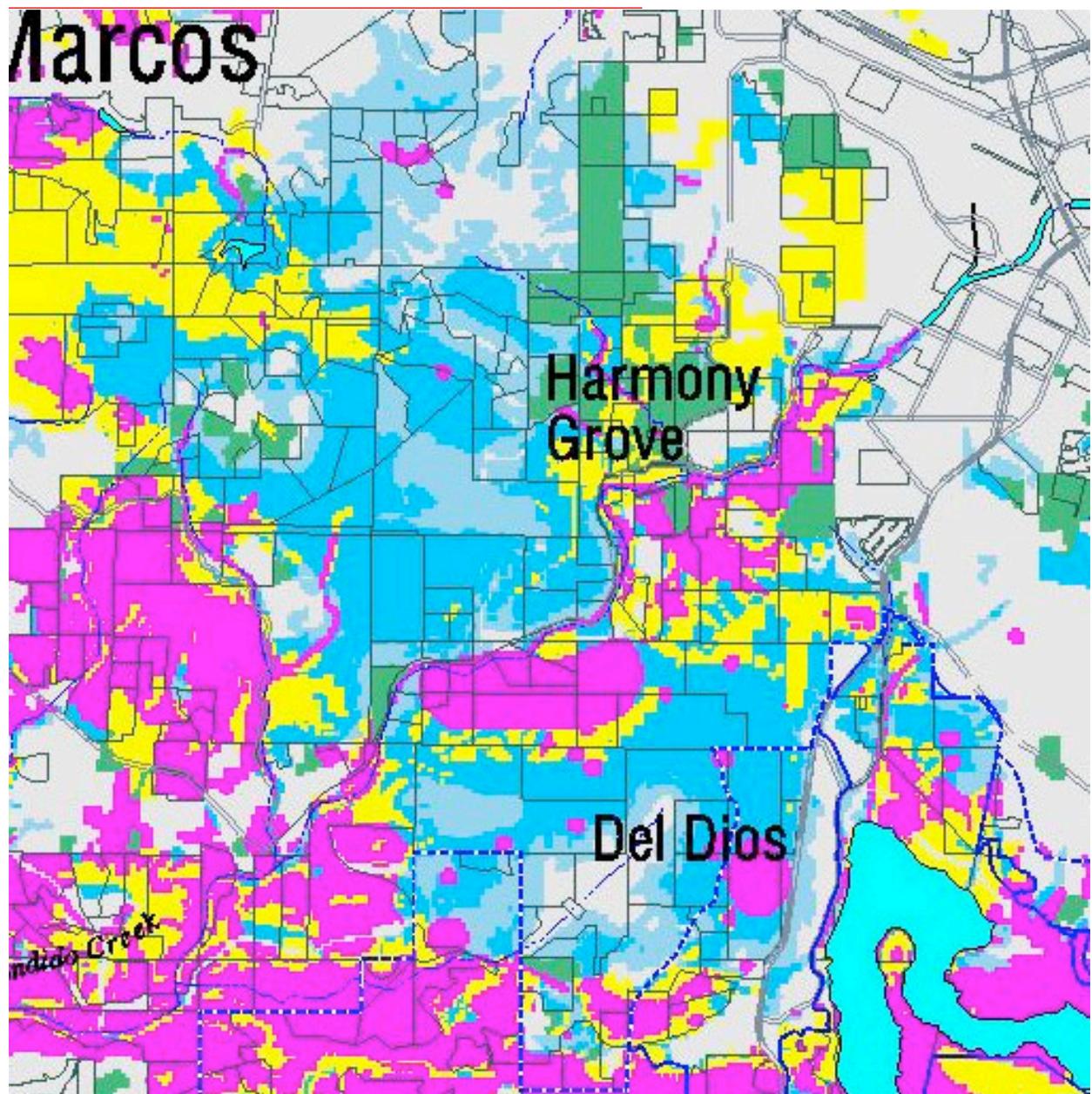
The original map presented by DPLU with density split on both sides of the creek and placing added density on what is now SD-7 (splitting the 742 units between these two areas)



The map DPLU and the community agreed to, which places all the density on the North side of the creek in a decreasing density pattern, which leaves the valley South of the creek, where the high value habitat is situated, at current density.

Legend

- Developed
- Agriculture
- Low
- Medium
- High
- Very High



http://www.nctimes.com/news/local/article_624882ef-f274-5429-9698-2955f3dc75b6.html

**Supervisors OK Harmony Grove Village By: QUINN EASTMAN - Staff Writer |
Posted: Thursday, February 8, 2007 12:00 am**

SAN DIEGO - A proposal to build a 742-home village in the rural Harmony Grove area west of Escondido sailed through the county Board of Supervisors on Wednesday.

Developer New Urban West is planning to build Harmony Grove Village on 468 acres, most of which were previously two chicken farms.

The project includes public trails and a private equestrian facility, a fire station, a sewer treatment plant and space for stores designed to serve the neighborhood. It has town houses and shopkeeper units in the center of the community, with more spacious spreads on its edges.

Construction could begin next year, the developer has said.

The supervisors hailed Harmony Grove Village's design process as a model of cooperation between a developer and a community.

"We've never had an audience so overwhelmingly in favor of a project," said Supervisor Bill Horn. More than 20 people addressed the board, mostly supporting New Urban West.

The Santa Monica-based developer held dozens of meetings over several years with the Elfin Forest/Harmony Grove Town Council, a civic association that represents the area.

The Town Council remained neutral on the project, partly because of concerns about the planned fire station, said its president, Eric Anderson.

Elfin Forest/Harmony Grove fire Chief Frank Twohy told county officials that even with the county's \$500,000 contribution annually, he would not have enough money to fully staff and equip the planned station.

Many members of the Town Council supported New Urban West's plan.

"Decades of mining and agricultural use have taken their toll on the community," said 30-year resident Bill Wilgenburg. "We are in need of a face-lift."

New Urban West enlisted wetlands experts to design a restoration project for a half-mile of Escondido Creek. It also formed a separate focus group called Friends of Harmony Grove Village, whose co-chairpersons both addressed the board urging the project's approval.

Even after extensive discussion with the community, officials had to forge a "safety enhancement" compromise over the future path of twisting Country Club Drive east of the project, limiting the speed to 25 mph.

The county's road designers had originally wanted to smooth out Country Club Drive's corners, citing its high accident rate and the expectation that traffic on the road will triple when new residents arrive.

But current residents opposed the changes to the road.

Gordon Fines, owner of Harmony Grove Equestrian Center, told the board that smoothing Country Club's curves to allow more cars would cut into his property and would be "devastating" to his horses and his business.

The main road in and out of the Harmony Grove Village project is a new east-west route that will connect with Citracado Parkway, which the city of Escondido is planning to extend.

County officials also had to assure people who live on or near Bresa de Loma Drive that the Harmony Grove Village project would not cut off access to their properties.

Other residents urged the board to define the scope of development around Harmony Grove, looking ahead to the unfinished General Plan 2020 update of zoning around the county.

"The only reason the room is not packed with residents opposing this project is their trust in county staff's plan," said Town Council member Jacqueline Arsivaud-Benjamin.

Several developers have been exploring projects nearby with county planners, but none of them have plans as advanced as New Urban West's.

County planning staff's proposed map under General Plan 2020 allows Harmony Grove Village, but limits other building nearby.

An alternative plan proposed by the supervisors calls for several housing projects with hundreds of homes to be built in the area.

Supervisor Horn noted that when the Harmony Grove Village project was first proposed, he thought the county's zoning update would be complete before the project came to the board.

The supervisors are supposed to vote on the zoning update, which has been delayed several times, in about a year. - Contact staff writer Quinn Eastman at (760) 740-5412 or qeastman@nctimes.com.

Harmony Grove Meadows

Lardy, Eric <Eric.Lardy@sdcounty.ca.gov>

Wed, Feb 2, 2011 at 3:59 PM

To: j.arsivaud@gmail.com

Hi Jacqueline,

Here is the information we put together on Harmony Grove meadows. Please let me know if you have any questions

HARMONY GROVE MEADOWS (SD7)

Harmony Grove Meadows was a project on approximately 110 acres, and was originally two referrals, #58: Trapp and #59: Grey, in the Residential Board of Supervisors hearings in 2004. The designations for the property are as follows:

- *Existing GP* - primarily Multiple Rural Use and Intensive Agriculture (1 du/4, 8 or 20) acres and could potentially result in 20 to 27 units.
- *Referral Map* - primarily VR-2, with some RL-20, which could potentially result in 214 units.
- *Recommended Project (same as Draft Land Use Map)* - a combination of SR-2 (20 acres), SR-4 (60 acres), and RL-20 (30 acres), which could potentially result in 22 to 26 units.

Again, a portion of the site is constrained by steep slopes, so an actual unit yield for Semi-Rural designations would ultimately be determined when a project is submitted to DPLU.

On the site, Harmony Grove Meadows was a General Plan Amendment and Specific Plan project that began processing with DPLU in 2005. In November of 2009 the project was withdrawn by the applicant.

Thanks!

Eric Lardy

General Plan Update

Department of Planning and Land Use

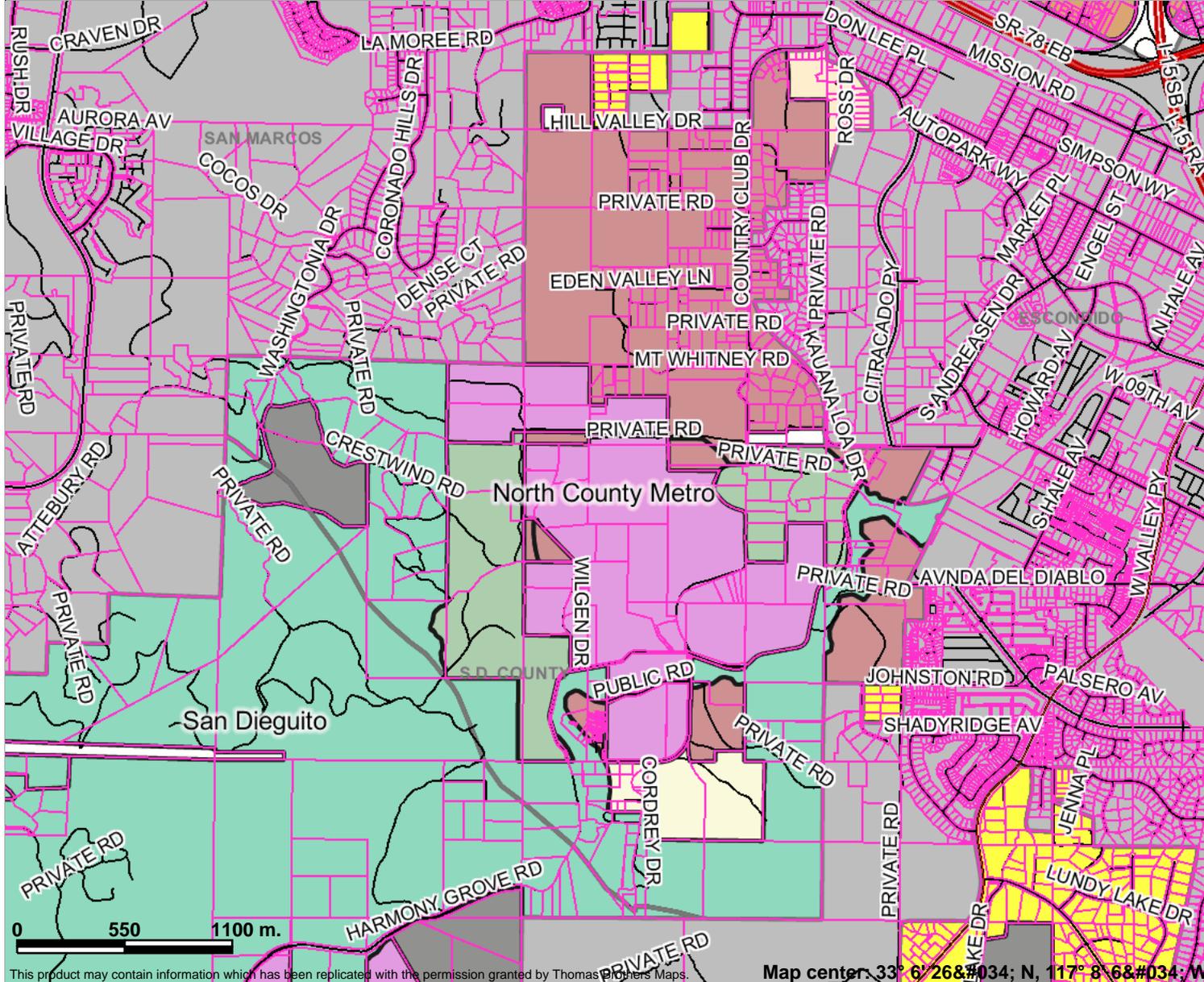
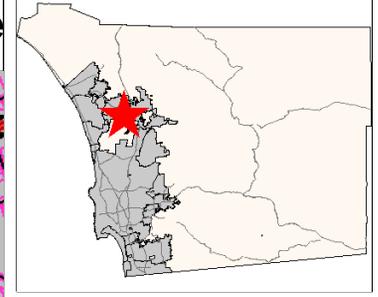
County of San Diego

858-694-2457

eric.lardy@sdcounty.ca.gov

www.sdcounty.ca.gov/dplu/gpupdate

Harmony Grove, General Plan Update Proposed Densities Draft Land Use



Legend

- Parcels
- Highways
- Freeways
- Streets
- Water Bodies
- Water Bodies
- Sponsor Groups
- Sponsor Groups
- Other
- Community Planning Area
- Community Planning Areas
- Incorporated Areas
- S.D. COUNTY
- Other
- GP2020 - Draft Land Use August 2006

- Village Residential (VR-30)
- Village Residential (VR-24)
- Village Residential (VR-20)
- Village Residential (VR-14.5)
- Village Residential (VR-10.9)
- Village Residential (VR-7.3)
- Village Residential (VR-4.3)
- Village Residential (VR-2.9)
- Village Residential (VR-2)
- Semi-Rural Residential (SR-1)
- Semi-Rural Residential (SR-2)
- Semi-Rural Residential (SR-4)
- Semi-Rural Residential (SR-10)
- Rural Lands (RL-20)
- Rural Lands (RL-40)
- Rural Lands (RL-80)
- Rural Lands (RL-160)

Scale: 1:30,985

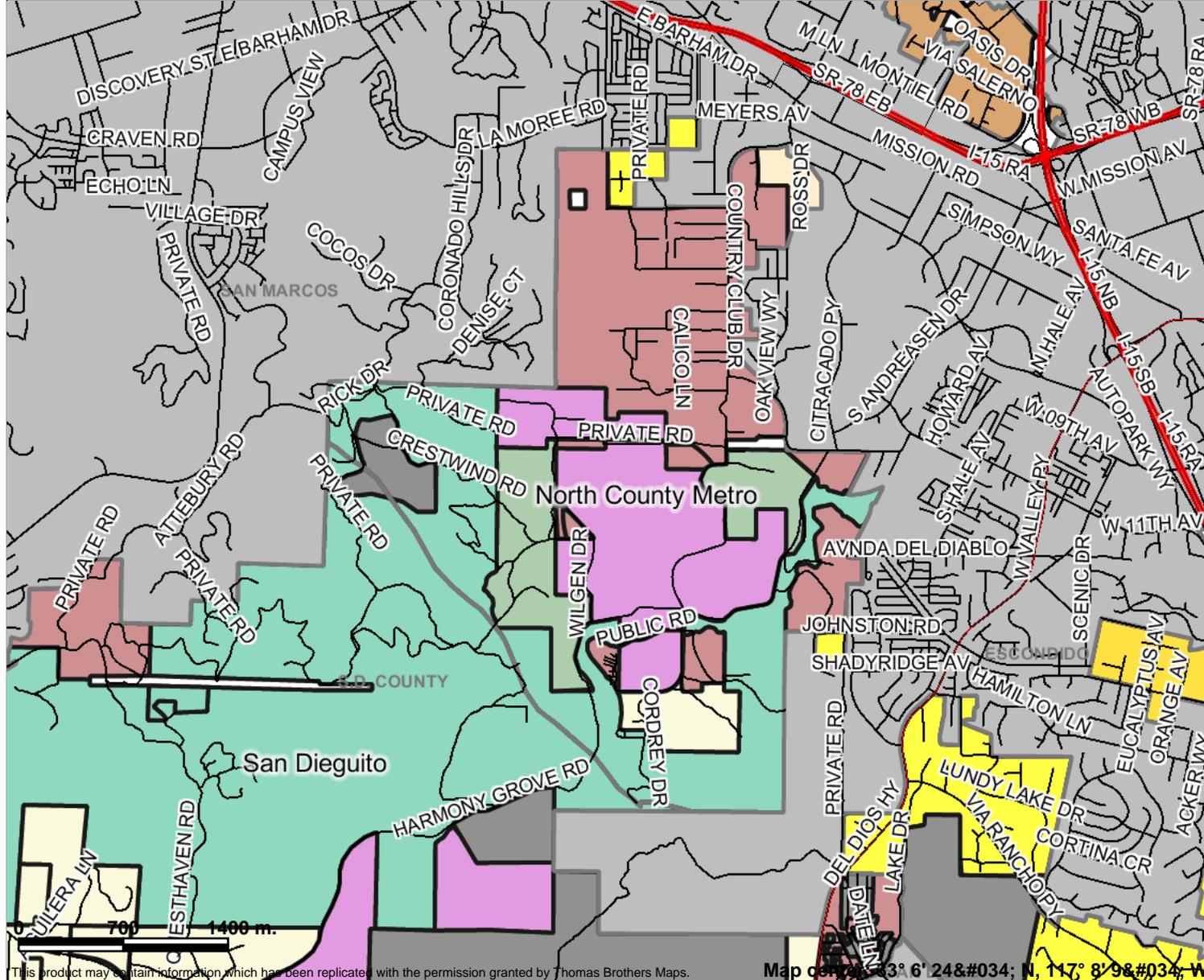
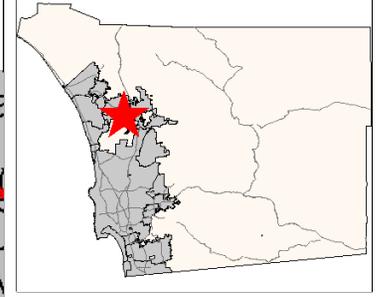
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Map center: 33° 6' 26.8" N, 117° 8' 6.8" W

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Harmony Grove Draft Land Use Map, General Plan Update



Legend

- Highways
- Freeways
- Streets
- Water Bodies
- Sponsor Groups
- Sponsor Groups
- Other
- Community Planning Area
- Community Planning Areas
- Incorporated Areas
- S.D. COUNTY
- Other
- GP2020 - Draft Land Use August 2006

- Village Residential (VR-30)
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- Rural Lands (RL-20)
- Rural Lands (RL-40)
- Rural Lands (RL-80)
- Rural Lands (RL-160)
- Specific Plan Area

Scale: 1:40,454

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Map center: 117° 8' 98" W; 33° 6' 248" N

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Harmony Grove Visioning Workshop I, Part I

GOALS:

- Work with the community to create the plan for a unique *Village* in Harmony Grove.
- Incorporate the Village plan into General Plan 2020.

Why Create a Village Plan for HARMONY GROVE?

- Regional Land Use Concepts
- Population Target
- Regional Land Use Goals and Policies
- Community Plan Goals and Policies

Regional LAND USE GOAL I

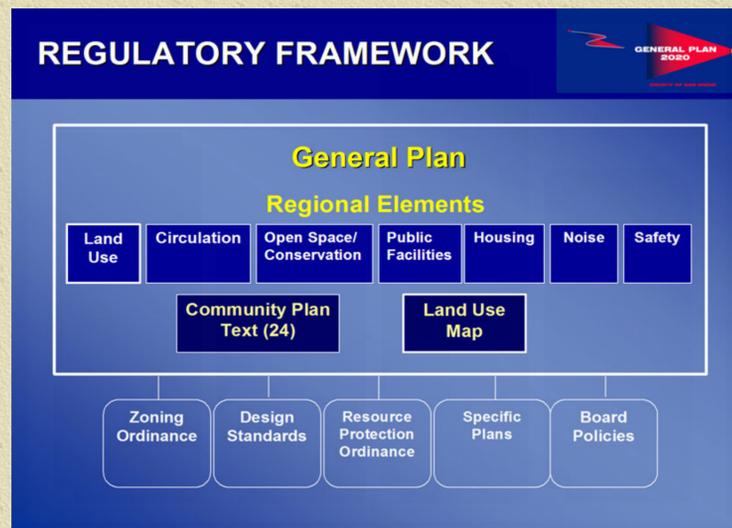
LAND USE GOAL I: *A built environment that is compatible with and sensitive to its natural setting.*

Policy E. Utilize design and development techniques which preserve the character of the community and protect environmental resources.

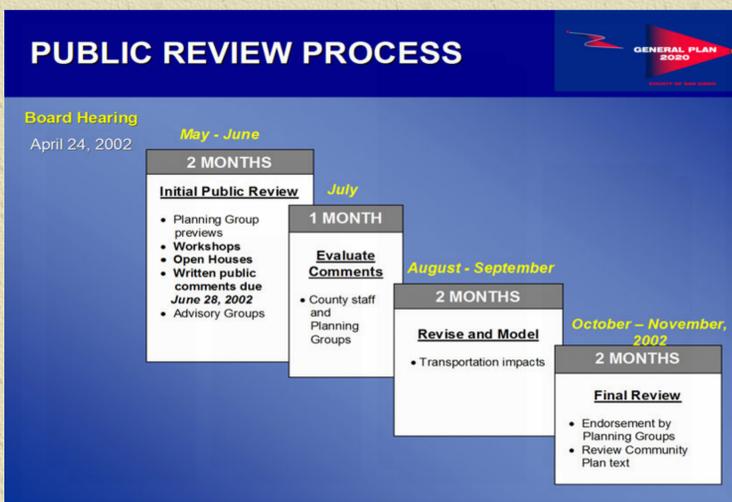
Policy J Urban growth be directed to areas within or adjacent to existing urban areas, and that the rural setting and lifestyle of the remaining areas of the County be retained.

What is

GENERAL PLAN 2020?

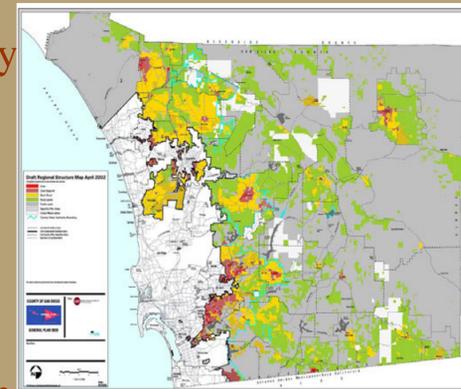


GP2020 STATUS



Regional Land Use CONCEPTS

- Direct future growth primarily within the County Water Authority boundary
- Locate development in or adjacent to existing communities
- Preserve significant biological habitat
- Accommodate a population target of 660,000



Community Plan GOALS & POLICIES

Land Use General Goal:

Provide a distribution of land uses that is compatible with the existing character of the community and that is integrated with the planning activities of the surrounding jurisdictions.

Regional LAND USE GOAL II

LAND USE GOAL II: *Communities and country towns of unique local character.*

Policy A: Maintain and enhance the unique character of each individual unincorporated community.

Policy B: Development that is adjacent to incorporated cities shall retain the character of the unincorporated community and shall use open-space buffers, or other techniques, where adjacent uses or densities are incompatible.

Harmony Grove Visioning Workshop I, Part II

GREAT PLACES: Please give a Quick, one or two words, description of a Great Town/Village/Place you Love.

Suburban Model



Existing General Plan

Existing Dwelling Units: **27** (75 People)

Existing Parcels: **53** (Avg. 1 Du/8 ac.)

Existing GP Designations:

1du/2,4 @ 100 acre = **25/50** Du's

1du/2,4,8 @ 300 acre = **38/75/150** Du's

1du/4,8,20 @ 50 acre = **2/6/11** Du's

Current Allowed Dwelling Units:

106 Du's @ 2.75 People per Home = **291** (1/4 ac)

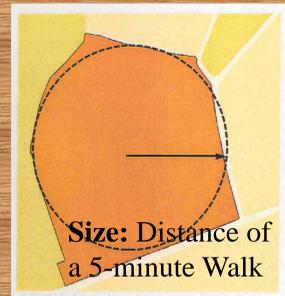
211 Du's @ 2.75 People per Home = **580** (1/2 ac)

An Increase of the Current Population 7x



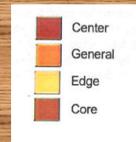
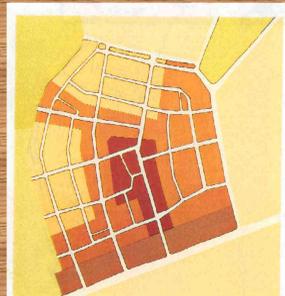
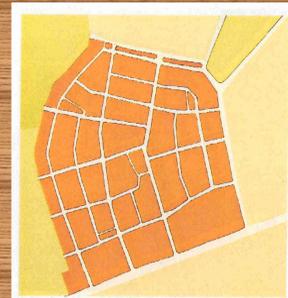
Neighborhood Scale

Range of uses, building types, and intensities

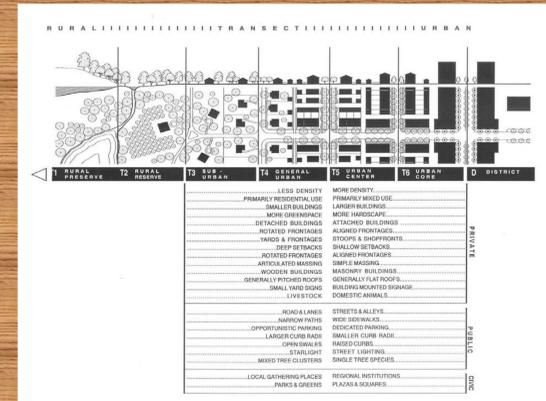


Size: Distance of a 5-minute Walk

Walkable Blocks
Connections between neighbors



Rural to Urban



Rural Edge

Places: Escondido Creek, Farms, Residential, Districts



Spaces: Special Residential Districts

Building Types: Barns, Corrals, Trailers

Buildings: Single-Family homes



Spaces: Roads, swales

Town General



Places: Residential Neighborhoods, Equestrian Facilities



Spaces: Roads, Swales, Paths



Building Types: Single-Family Homes, Setbacks, Privacy

Town Center



Places: Entry Features, Plazas, parks, Squares, Commercial Services



Buildings: Courtyard Homes, Detached Homes, Attached Townhouses



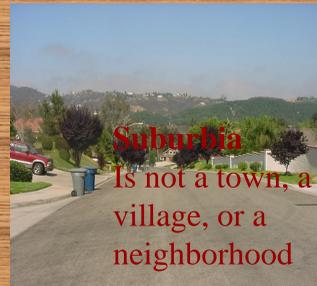
Building Types: 2-3 story, Attached, Detached, Civic Buildings



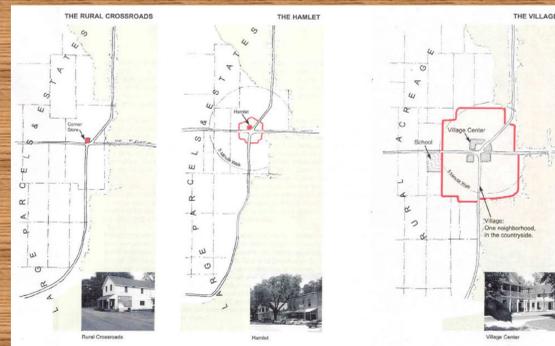
Spaces: Service Alleys, Curb and Gutter, Sidewalks, Streets



Suburbia is not a town, a village, or a neighborhood

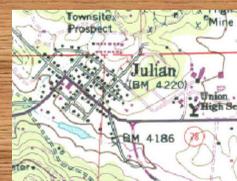
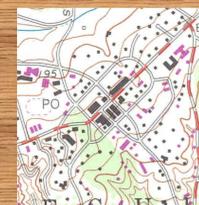
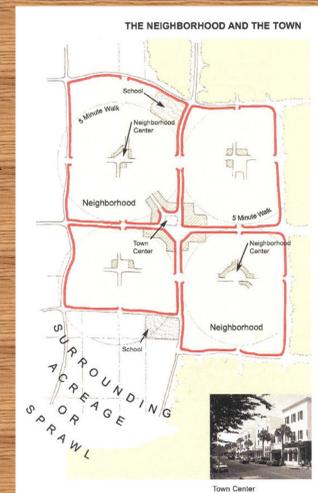


Defining a Village



Buildings: Single-Family homes

Neighborhood Model



Village Elements

Curb/Gutter/Sidewalks/Alleys
Solid Block Walls
Buildings Front Streets
Public Spaces/ Civic Art
High Visibility/ High Connectivity
Mixed Building Types



Rural Elements

Narrow Roads/Swales
Buildings Setback from Roadway
Private Gardens/Spaces
Residential /Animal Keeping
Clear Delineation Between Public and Private Places
Split Rail Fences

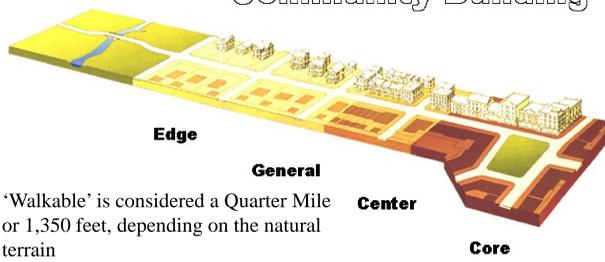


4 Du./Ac. Streetscape, Boulevard

Town Planning Principles

Center, Edge, Corridor, District, Walkable, Mixed, with a Transition of Defined Places and Building Types

Community Building



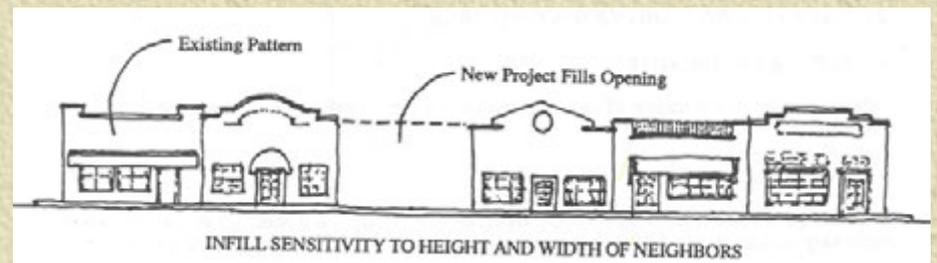
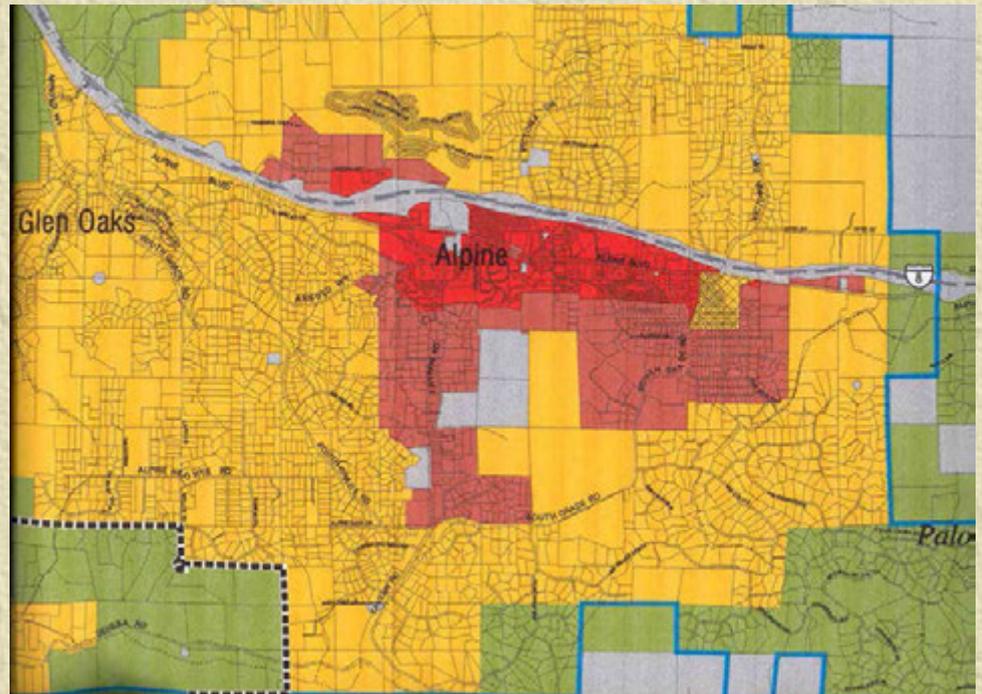
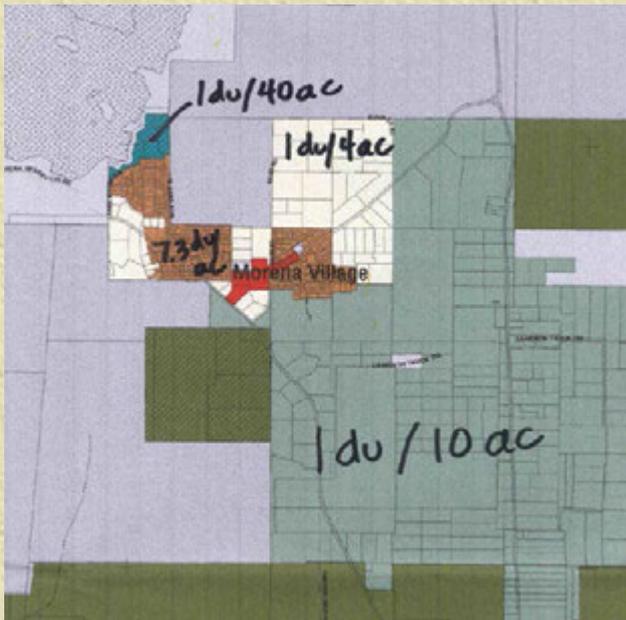
'Walkable' is considered a Quarter Mile or 1,350 feet, depending on the natural terrain

Coming Together:
**HARMONY GROVE
VISION
&
GENERAL PLAN 2020**



GP2020 TOOLS

- General Plan Land Use Designation Map, Community Plan, Zoning, Design Standards





Defining the
CONTEXT

Step 2: Identifying
OPPORTUNITIES & CONSTRAINTS

PHYSICAL Opportunities



- ☀ Landscape
(topography, low bio. sensitivity excepting stream, stream)
- ☀ Circulation (also constraint)]
- ☀ Nearby Development
- ☀ Etc.



PHYSICAL Constraints



☀ Circulation

☀ Steep slopes, etc.



SOCIAL Opportunities

- ✦ Elfin Forest Recreational Preserve
- ✦ Residential Development (Constraint? Both.)
- ✦ Local Jobs/ Services (in incorporated areas)

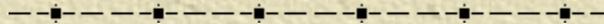
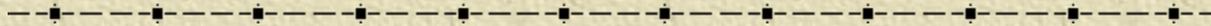


SOCIAL Constraints



✦ Industrial Parks-
Existing and
Potentially Proposed
(Escondido)

Putting the Elements Together to
PLAN the TOWN



Step 5: Planning the Town



Be a part of
**HARMONY GROVE
VISIONING WORKSHOP
II**

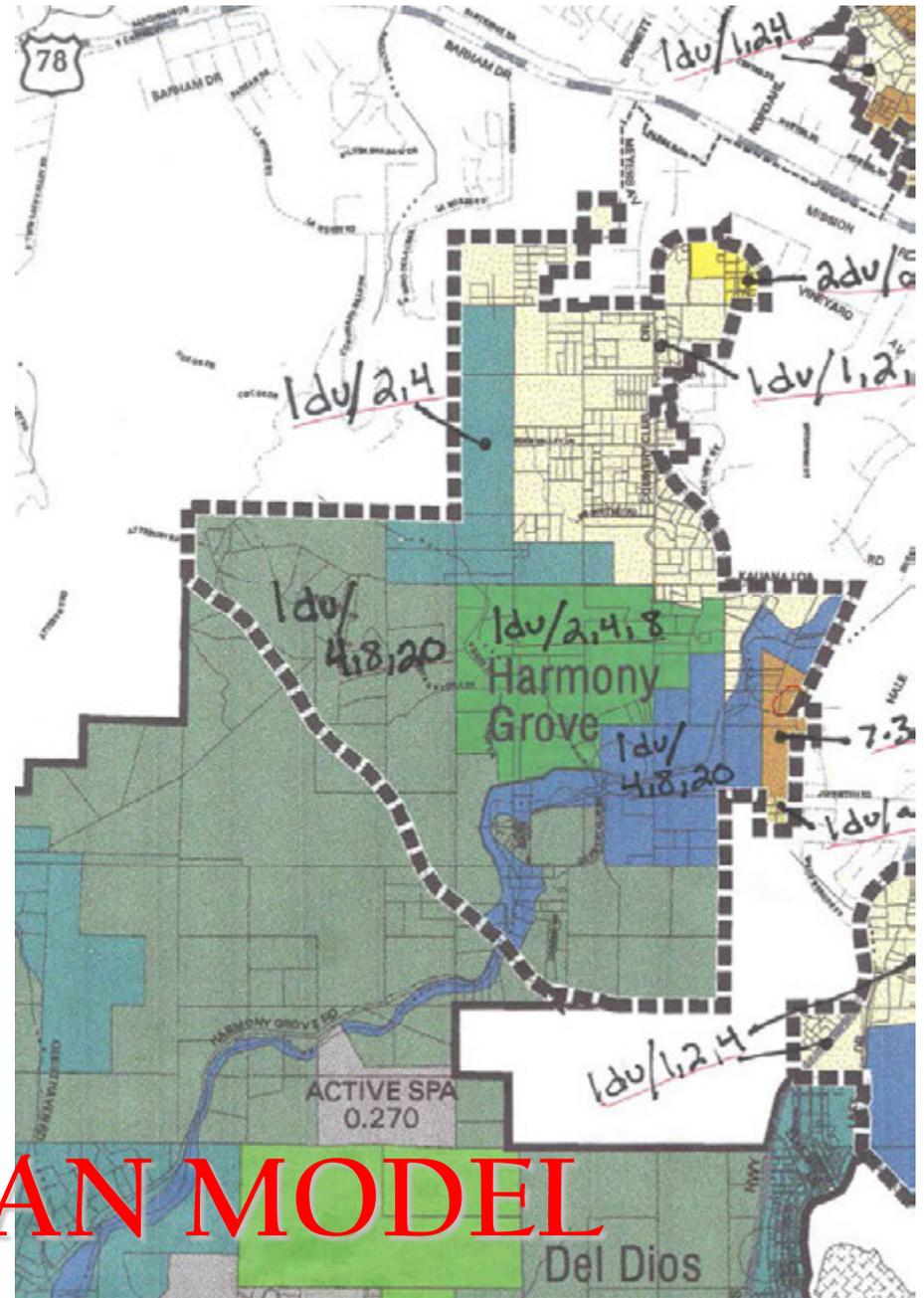
Tuesday, August 13th

7pm-9:00pm

Harmony Grove Spiritualist Association

Great Places

Please give a Quick, one or two words, description of a Great Town/Village/Place you Love.



SUBURBAN MODEL

Existing General Plan:

Existing Acreage: +450

Existing Dwelling Units: 27 (75 People)

Existing Parcels: 53 (Avg. 1 Du/8 ac.)

Existing GP Designations:

1du/2,4 @ 100 acre = 25/50 Du's

1du/2,4,8 @ 300 acre = 38/75/150 Du's

1du/4,8,20 @ 50 acre = 2/6/11 Du's

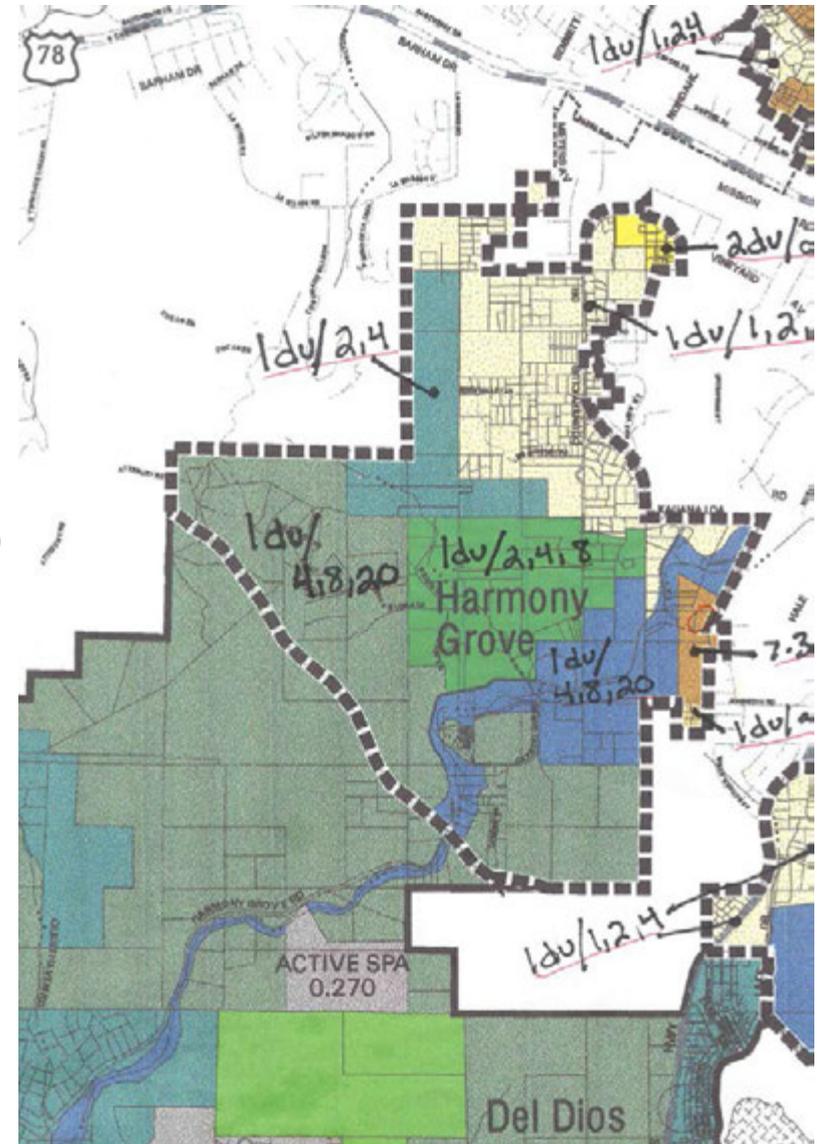
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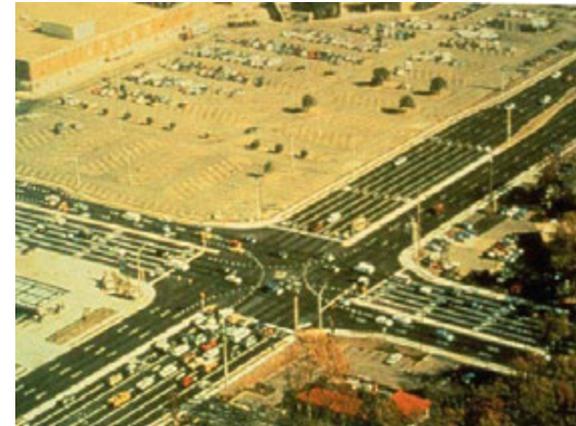
An Increase of the Current Population 7x

Suburbia





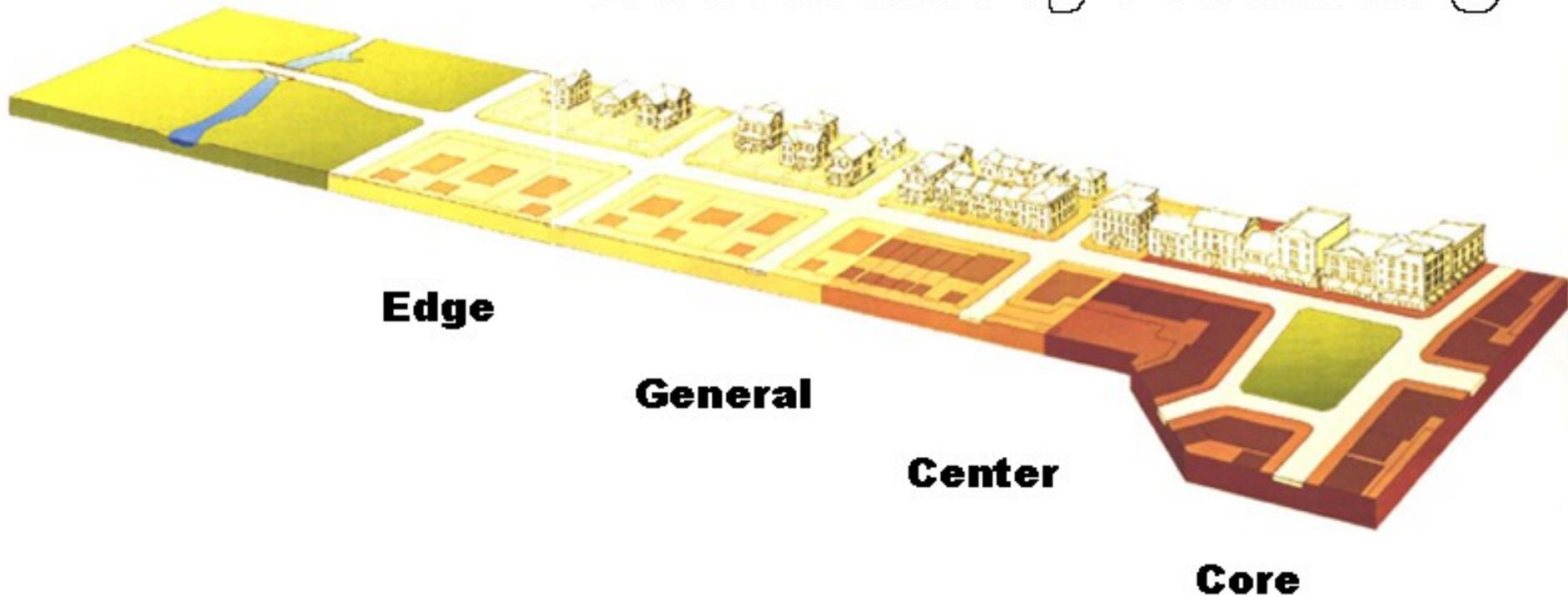
Suburbia
Is not a town,
a village, or a
neighborhood



Town Planning Principles

Center, Edge, Corridor, District, Walkable, Mixed, with a Transition of Defined Places and Building Types

Community Building



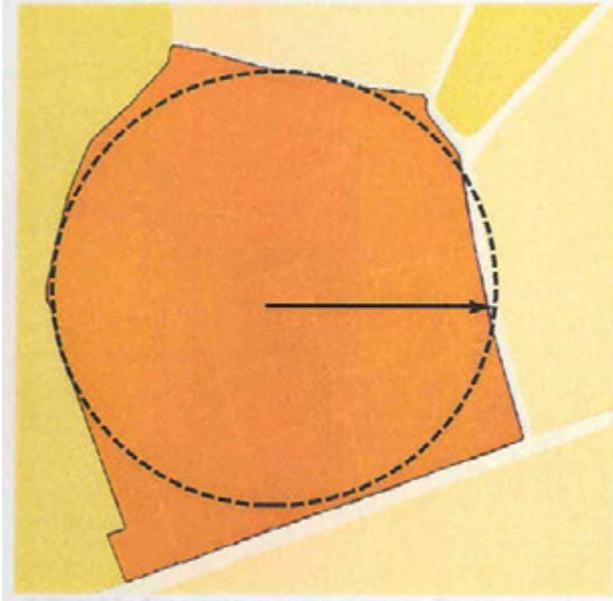
‘Walkable’ is considered a Quarter Mile or 1,350 feet, depending on the natural terrain

Neighborhood Scale

Range of uses, building types, and intensities

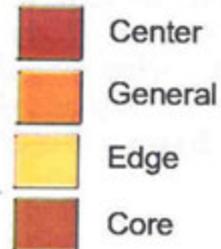
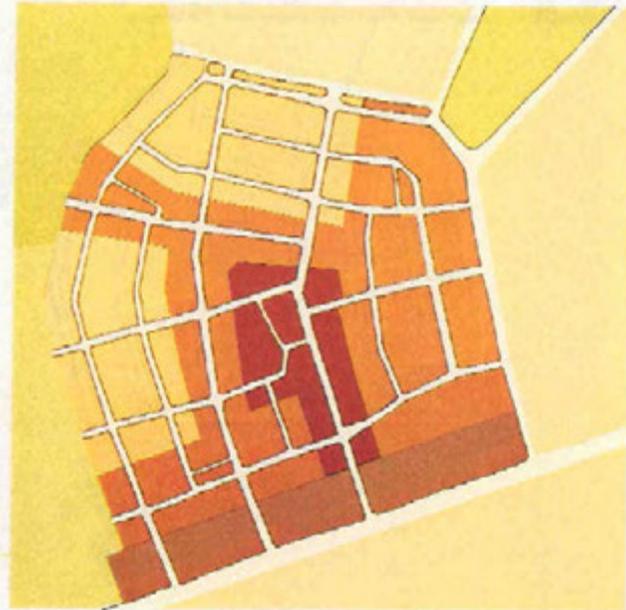
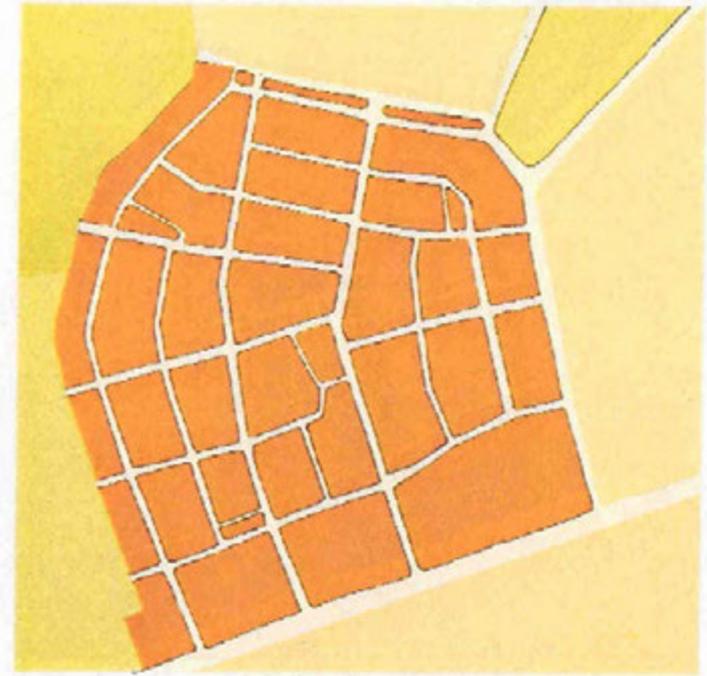
Size

Distance of
a 5-minute
Walk



Walkable
Blocks

Connections
between
neighbors



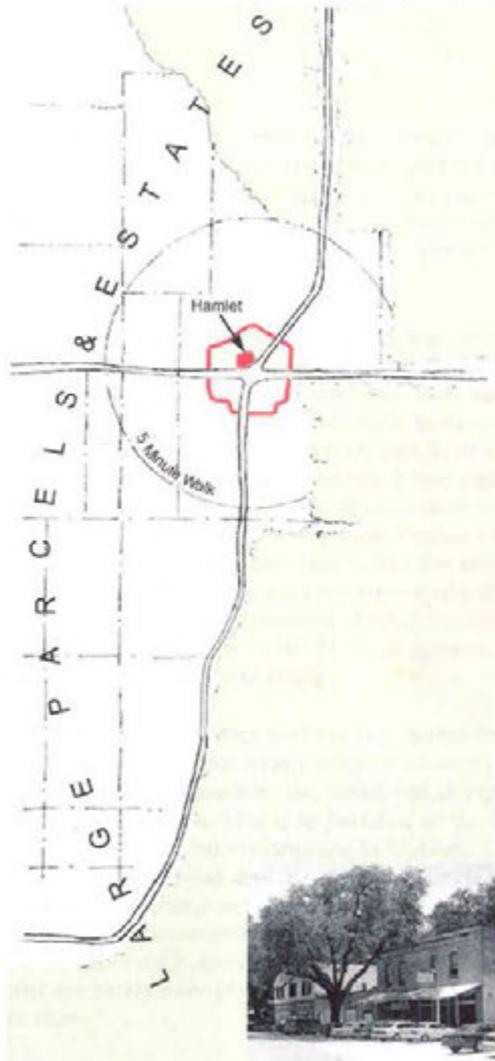
THE RURAL CROSSROADS



Rural Crossroads



THE HAMLET



Hamlet



THE VILLAGE

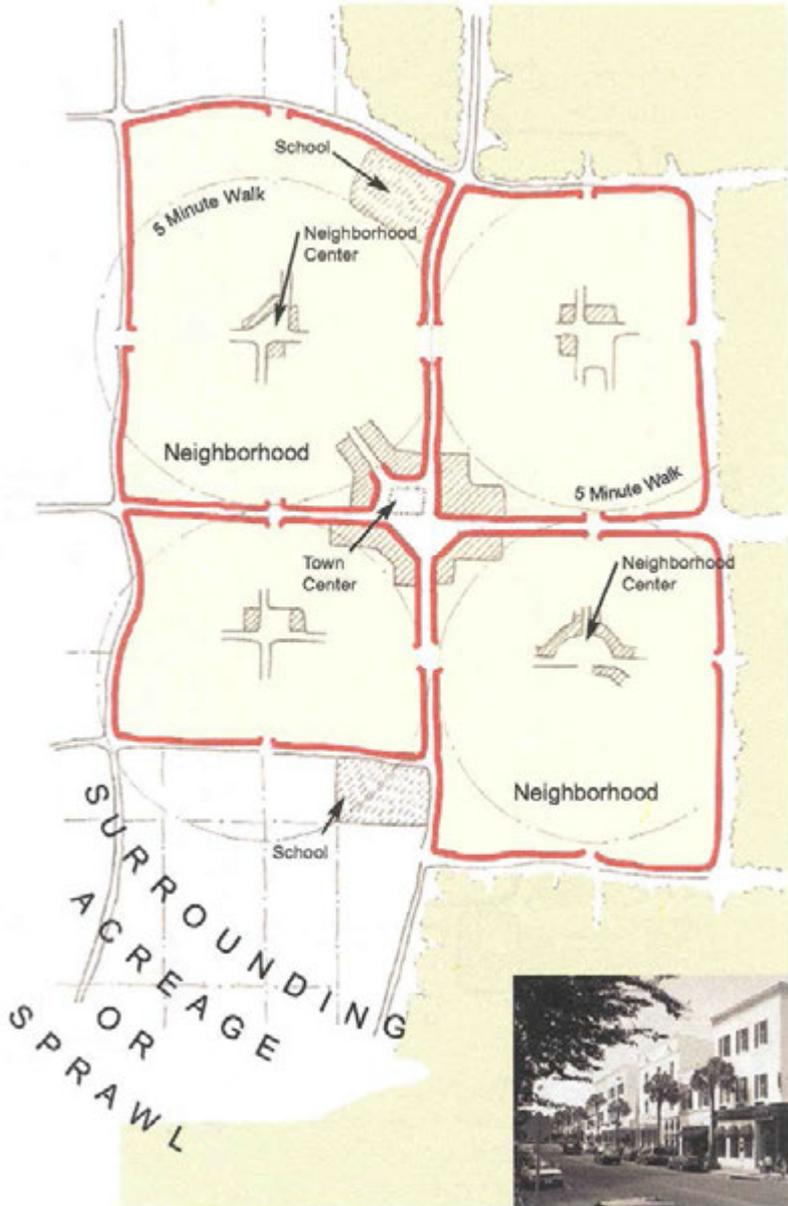


Village Center



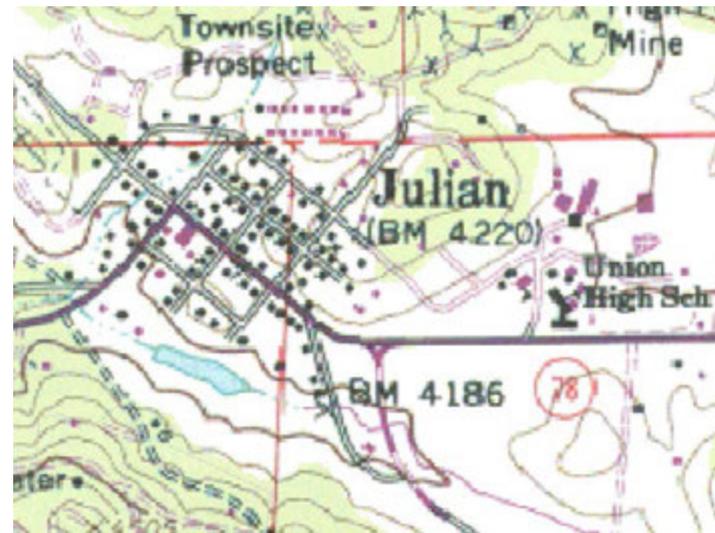
Defining a Village

THE NEIGHBORHOOD AND THE TOWN



Town Center

Neighborhood Model





Places:
Escondido Creek

Rural Edge

Spaces: Special Residential Districts



Buildings: Single-Family homes



Places: Farms,
Residential, Districts

Rural Edge

Building Types: Barns, Corrals, Trailers



Spaces: Roads, swales



Town General



Spaces: Roads, Swales, Paths

Places: Residential Neighborhoods,
Equestrian Facilities

Building Types: Single-Family
Homes, Setbacks, Privacy



Buildings: Courtyard Homes,
Detached Homes, Attached
Townhouses



Town Center

Places: Entry Features, Plazas, Squares



Town Center



Places: Plazas, Squares, Parks, Commercial Services

Building Types: 2-3 story, Attached, Detached, Civic Buildings

Spaces: Service Alleys, Curb and Gutter, Sidewalks, Streets

Isolation Model:

sprawl
 experimental, since 1945
 segregation of uses into pods
 car is a prerequisite to survival
 measurable in car trips
 consumes wildlife habitats and farmland
 horizontal zoning
 confusing, ambiguous form
 financed and constructed all at once
 has "developers"
 forgettable and disposable

Certain to *Increase*:

traffic
 pollution
 infrastructure costs
 sameness
 crime

Certain to *Reduce*:

community character
 affordable housing
 diversity
 choice

Community Model:

neighborhoods
 field tested, for 5000 years
 mix of uses in streets and blocks
 car is an option
 measurable in walking distances
 conserves wildlife habitats and farmland
 vertical zoning
 legible public spaces
 financed and constructed incrementally
 has "founders"
 memorable and lasting

Certain to *Reduce*:

traffic
 pollution
 infrastructure costs
 sameness
 crime

Certain to *Increase*:

community character
 affordable housing
 diversity
 choice

Village Elements

Curb/Gutter/Sidewalks/Alleys

Solid Block Walls

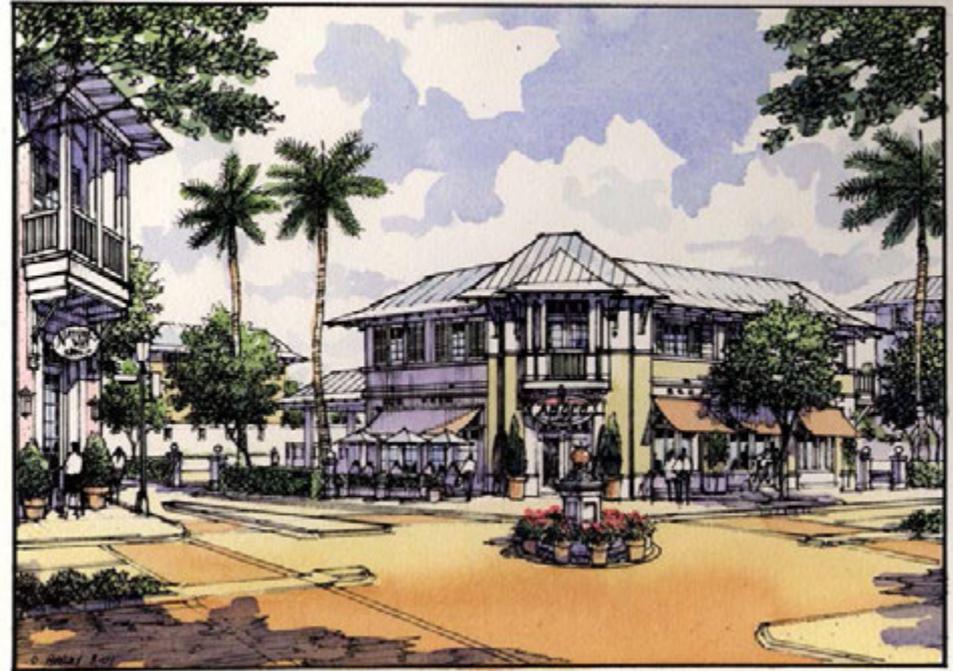
Buildings Front Streets

Public Spaces/ Civic Art

High Visibility/ High Connectivity

Mixed Building Types

Ground Floor Commercial



More Urban

Rural Elements

Narrow Roads/Swales

Buildings Setback from Roadway

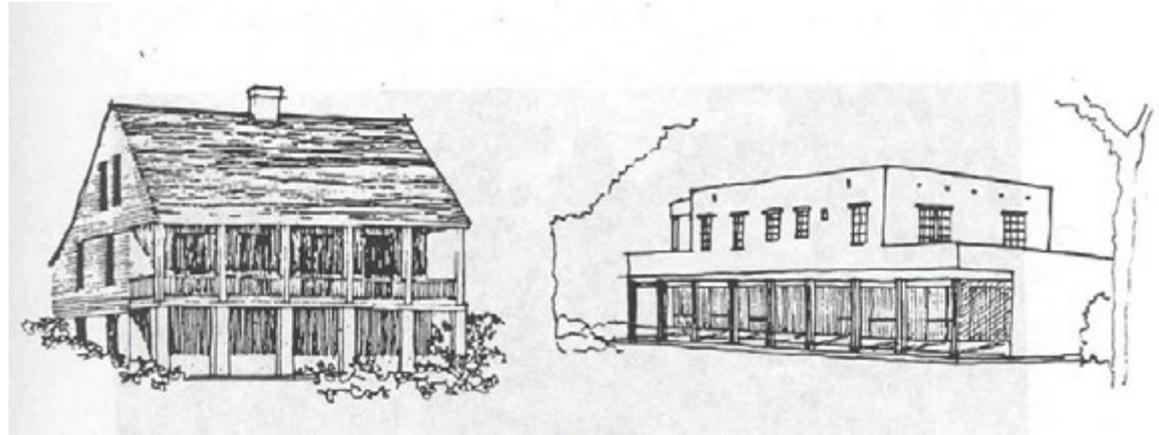
Private Gardens/Spaces

Residential /Animal Keeping

Clear Delineation Between Public
and Private Places

Split Rail Fences

More Rural



4 Du/Ac. Streetscape, Boulevard



The Village of Harmony Grove

