

# EXHIBIT 3

# SAN DIEGO UNION TRIBUNE

## SUPERVISORS OK HARMONY GROVE VILLAGE

By QUINN EASTMAN - Staff Writer  
Feb. 8, 2007

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](mailto:qeastman@nctimes.com)

<http://www.utsandiego.com/news/2007/feb/08/supervisors-ok-harmony-grove-village/?#article-copy>



# **EXHIBIT 4**

# **FINAL ENVIRONMENTAL IMPACT REPORT**

**San Diego County General Plan Update  
DPLU Environmental Log No. 02-ZA-001  
State Clearinghouse (SCH) #2002111067**

## **COMMENT LETTERS AND RESPONSES TO COMMENTS ON THE DRAFT EIR**

### ***ORGANIZATIONS***

#### **Lead Agency:**

**County of San Diego  
Department of Planning and Land Use  
5201 Ruffin Road, Suite B  
San Diego, CA 92123  
Contact: Devon Muto, Chief of Advanced Planning**

**August 2011**

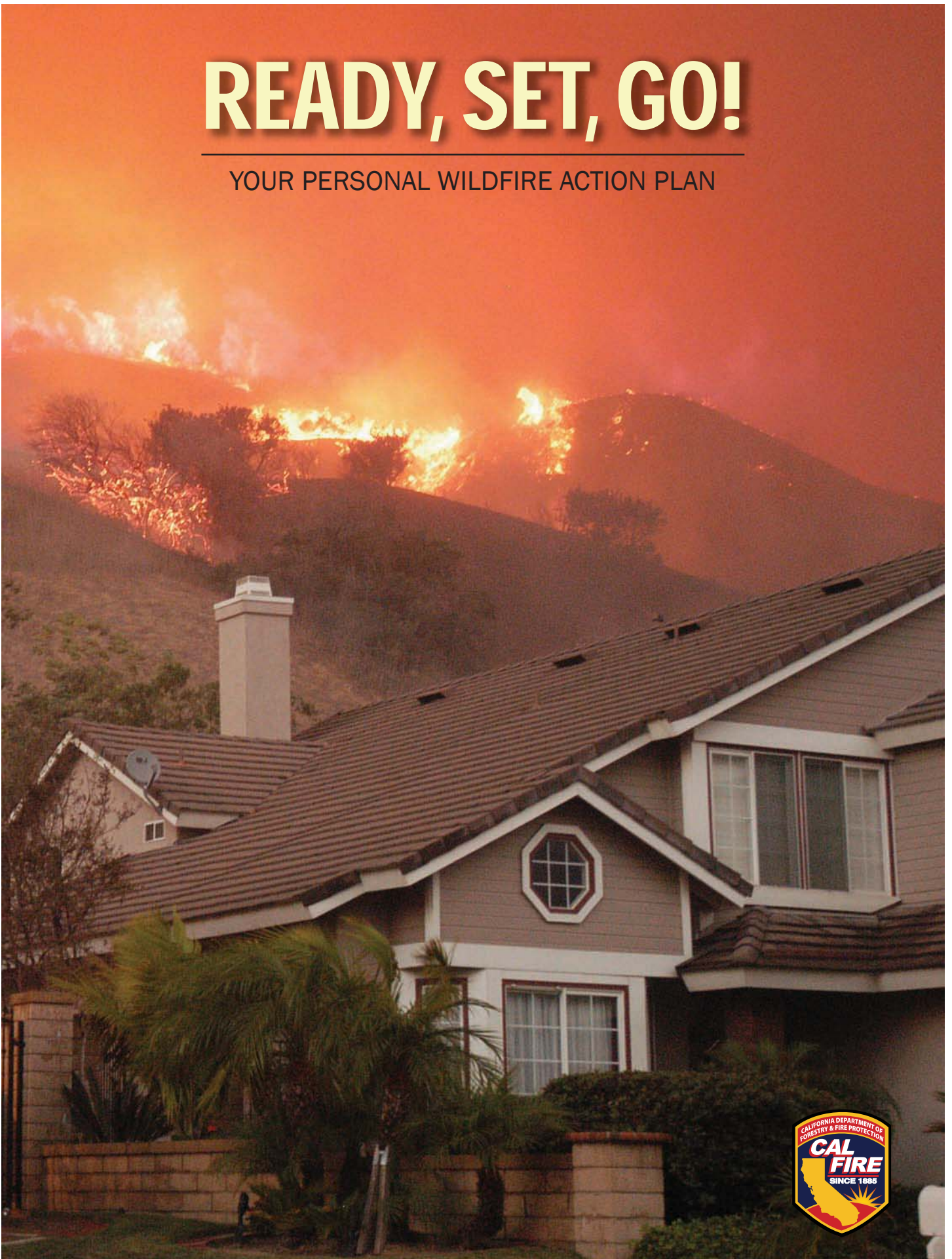
**Responses to Letter O 3, East San Diego County Association of Realtors (cont.)**

- O3-6 The County does not agree with this comment. There is no evidence shown to support the claim that conservation subdivisions would impact land use patterns or that they constitute an inefficient use of property.
- O3-7 The County does not agree with this comment. The County does not claim to offer certainty that subdividers will achieve potential yield of housing units under the CSP. However, County staff's research shows that the CSP will remove various constraints that currently result in loss of potential dwelling units. Furthermore, based on this research, standard or alternative septic systems will typically still be accommodated within the consolidated development footprint in a conservation subdivision.
- O3-8 The CSP is not a part of the General Plan Update documentation but it is a component of the overall project as described in the DEIR project description. The various ordinance amendments that make up the CSP are described in Sections 1.6, 1.8.5, 1.8.6, 1.8.7, and 1.8.8. In addition, the CSP is a mitigation measure in the DEIR for impacts to aesthetics, agriculture, and biology.
- O3-9 The subheading for this comment appears to be referring to the language of the draft General Plan (permissive language versus mandatory language); however, the comment goes on to state that it is the language of the DEIR that is at issue. In either case, the issue of mandatory language versus permissive language has been considered carefully in preparing the General Plan Update documents. The County has avoided the use of "should" because it desires a General Plan that is clear on its intent and avoids debate during application. This approach has also been supported by a number of stakeholders and commenters on the General Plan Update who have indicated that they desire clear and firm commitments to certain policies and actions. See also responses to comments G7-2 and O9-2.
- O3-10 The County acknowledges the East San Diego County Association of Realtors support for the Referral Map, however does not agree that the stated reason is valid. The Hybrid Map, as well as the Draft Land Use, and Environmentally Superior Map have been established and available for the public to comment on since early 2008. Additionally, the maps have been presented to the Community Planning and Sponsor Groups, stakeholder groups, and have been available online and for display at the Department of Planning and Land Use. The assertion that the hybrid and other alternatives would result as a "de-facto no growth tool" is not supported by fact. The Hybrid Map and Draft Land Use Map would accommodate approximately 75,000 and 74,700 additional housing units respectively, –under five percent less than the 78,000 that are accommodated by the Referral Map. Ultimately, the Board of Supervisors will determine which land use map will be implemented.
- O3-11 The County acknowledges the East San Diego County Association of Realtors' concern regarding the need for alternative septic systems, but does agree that the specific language requested is appropriate in the General Plan. The State is still developing new regulations for the use of alternative septic systems. Any specific language concerning alternative septic systems is more appropriately addressed in the County Onsite Wastewater System Ordinance.

# **EXHIBIT 5**

# READY, SET, GO!

YOUR PERSONAL WILDFIRE ACTION PLAN





# READY, SET, GO!

## Wildfire Action Plan

Saving Lives and Property  
through Advance Planning



**W**ildfire is a serious threat to lives, property and natural resources in California. The men and women of CAL FIRE make countless preparations and train frequently in order to be ready for all types of emergencies, including wildfires. Residents need to do the same.

You can dramatically increase your safety and the survivability of your property by preparing well in advance of a wildfire. This brochure provides comprehensive information on how to improve your home's resistance to wildfires and prepare your family to be ready to leave early in a safe manner. We call this process, "Ready, Set, Go!"

The guide illustrates the importance of having defensible space around your home and it will help educate you about the preparations you need to make so you can leave early and evacuate well ahead of a wildfire. This brochure also provides information on how to retrofit your home with ignition resistant materials to address the threat of flying embers that can travel as far as a mile ahead of a flame front.

Fire is, and always has been, a natural part of the beautiful state we've chosen to live in. Wildfires, fueled by a build-up of dry vegetation and driven by hot, dry winds, are extremely dangerous and are challenging for firefighters to control. This publication will help you prepare your home so you can leave early; confident in the fact that you've done everything you reasonably can to protect your home from devastating wildfire.

I hope you'll find the information on the next pages helpful. As always, if you need more information about preparing for wildfire or any other disaster, contact your nearest fire station or visit us on the web at [www.fire.ca.gov](http://www.fire.ca.gov).

Chief Del Walters  
Director, CAL FIRE

All suggestions and requirements are based on State Codes and Regulations, specifically the California Building Code Chapter 7A, California Fire Code, and Title 14 Fire Safe Regulations. Contact your local fire and building department for specific requirements or recommendations for your community.

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This publication was prepared by the Ventura County Fire Department. Special thanks to CAL FIRE, Orange County Fire Authority, FireSafe Council, Firewise Communities, and the Institute for Business and Home Safety as well as many other organizations for their contributions to content.

Ready, Set, Go! is supported by:





# Living in the Wildland Urban Interface

Ready, Set, Go! begins with a house that firefighters can defend.

## Defensible space works!

If you live next to a natural area, the Wildland Urban Interface, you must provide firefighters with the defensible space they need to protect your home. The buffer you create by removing weeds, brush and other vegetation helps to keep the fire away from your home and reduces the risks from flying embers.



A home within one mile of a natural area is at risk of flying embers. Wind-driven embers can attack your home. You and your home must be prepared well before a fire occurs. Ember fires can destroy homes or neighborhoods far from the actual flame front of the wildfire.



# What is Defensible Space?



Defensible space is the required space between a structure and the wildland area that, under normal conditions, creates a sufficient buffer to slow or halt the spread of wildfire to a structure. It protects the home from igniting due to direct flame or radiant heat. Defensible space is essential for structure survivability during wildfire conditions and for the protection to firefighters defending your home.

## ZONE ONE

Zone One extends 30 feet out from buildings, structures, decks, etc.

- Remove all dead or dying vegetation.
- Trim tree canopies regularly to keep their branches a minimum of 10 feet from structures and other trees.
- Remove leaf litter (dry leaves/pine needles) from yard, roof and rain gutters.
- Relocate woodpiles or other combustible materials into Zone Two.
- Remove combustible material and vegetation from around and under decks.
- Remove or prune vegetation near windows.
- Remove "ladder fuels" (low-level vegetation that allows the fire to spread from the ground to the tree canopy). Create a separation between low-level vegetation and non-vegetative materials such as patio furniture, wood piles, swing set, etc., from tree branches. This can be done by reducing the height of low-level vegetation and/or trimming low tree branches.

## ZONE TWO

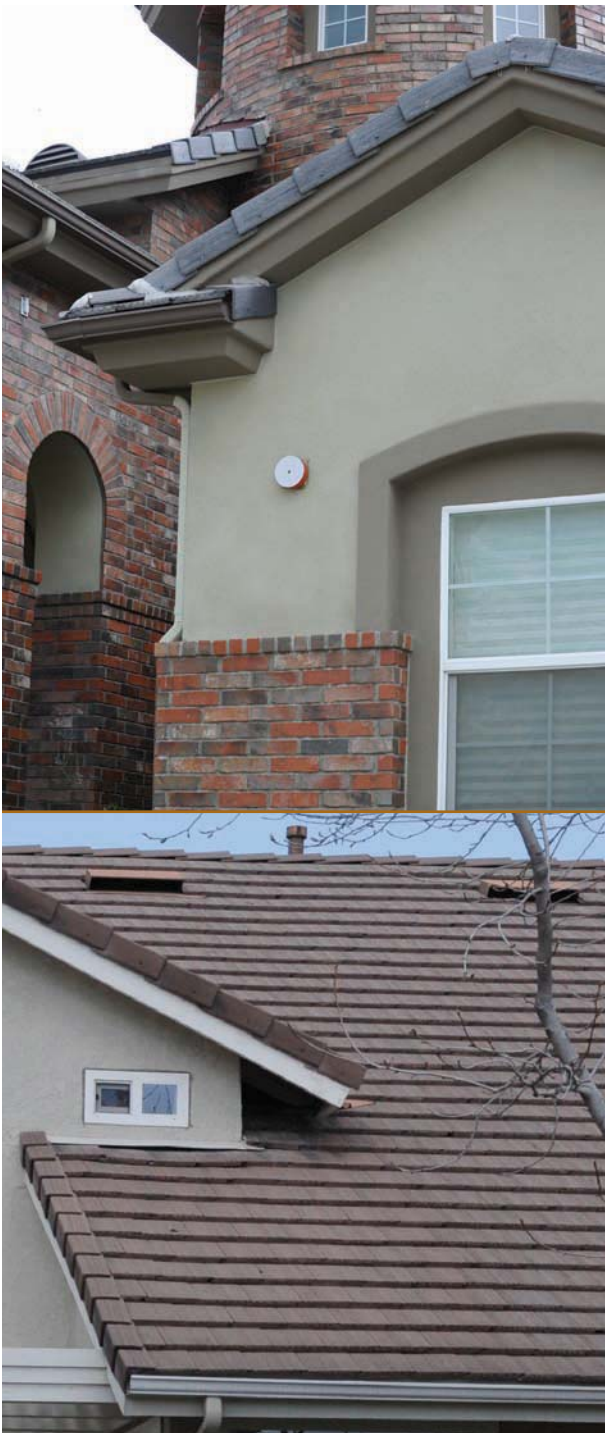
Zone Two extends 30 to 100 feet out from buildings, structures and decks. You can minimize the chance of fire jumping from plant to plant or other non-vegetative combustible, by removing dead material and removing, separating, and/or thinning vegetation. The minimum spacing between vegetation is three times the dimension of the plant or other non-vegetative combustible.

- Remove "ladder fuels."
- Cut or mow annual grass down to a maximum height of 4 inches.
- Trim tree canopies regularly to keep their branches a minimum of 10 feet from other trees.
- Loose surface litter, normally consisting of fallen leaves or needles, twigs, bark, cones, and small branches, shall be permitted to a depth of 3 inches if erosion control is an issue.



# What is a Hardened Home?

Construction materials and the quality of the defensible space surrounding it are what gives a home the best chance to survive a wildfire. Embers from a wildfire will find the weak link in your home's fire protection scheme and gain the upper hand because of a small, overlooked or seemingly inconsequential factor. However, there are measures you can take to safeguard your home from wildfire. While you may not be able to accomplish all the measures listed below, each will increase your home's, and possibly your family's, safety and survival during a wildfire.



## ROOFS

Roofs are the most vulnerable surface where embers land because they can lodge and start a fire. Roof valleys, open ends of barrel tiles and rain gutters are all points of entry.

## EAVES

Embers can gather under open eaves and ignite exposed wood or other combustible material.

## VENTS

Embers can enter the attic or other concealed spaces and ignite combustible materials. Vents in eaves and cornices are particularly vulnerable, as are any unscreened vents. New vents have been developed that prevent flame and embers from getting through to the attic.

## WALLS

Combustible siding or other combustible or overlapping materials provide surfaces or crevices for embers to nestle and ignite.

## WINDOWS and DOORS

Embers can enter gaps in doors, including garage doors. Plants or combustible storage near windows can be ignited from embers and generate heat that can break windows and/or melt combustible frames.

## BALCONIES and DECKS

Embers can collect in or on combustible surfaces or the undersides of decks and balconies, ignite the material and enter the home through walls or windows.

To harden your home even further, consider protecting your homes with a residential fire sprinkler system. In addition to extinguishing a fire started by an ember that enters your home, it also protects you and your family year-round from any fire that may start in your home.

All suggestions and requirements are based on State Codes and Regulations, specifically the California Building Code Chapter 7A, California Fire Code, and Title 14 Fire Safe Regulations. Contact your local fire and building department for specific requirements or recommendations for your community.

# Tour a Wildfire Ready Home

**Home Site and Yard:** Ensure you have at least a 100-foot radius of defensible space (cleared vegetation) around your home. Note that even more clearance may be needed for homes in severe hazard areas. This means looking past what you own to determine the impact a common slope or neighbors' yard will have on your property during a wildfire.

Cut dry weeds and grass before 10 a.m. when temperatures are cooler to reduce the chance of sparking a fire.

Landscape with fire-resistant plants that have a high moisture content and are low-growing.

Keep woodpiles, propane tanks and other non-vegetative combustible materials away from your home and other structures such as garages, barns and sheds.

Ensure that trees are far away from power lines.

**Roof:** Your roof is the most vulnerable part of your home because it can easily catch fire from wind-blown embers. Homes with wood-shake or shingle roofs are at high risk of being destroyed during a wildfire.

Build your roof or re-roof with ignition resistant materials such as composition, metal or tile. Block any spaces between roof decking and covering to prevent ember intrusion.

Clear pine needles, leaves and other debris from your roof and gutters.

Cut any tree branches within ten feet of your roof.

**Vents:** Vents on homes are particularly vulnerable to flying embers.

All vent openings should be covered with 1/8-inch to 1/4 inch metal mesh. Do not use fiberglass or plastic mesh because they can melt and burn.

Attic vents in eaves or cornices should be baffled or otherwise protected to prevent ember intrusion (mesh is not enough).

**Windows:** Heat from a wildfire can cause windows to break even before the home ignites. This allows burning embers to enter and start internal fires. Single-paned and large windows are particularly vulnerable.

Install dual-paned windows with one pane of tempered glass to reduce the chance of breakage in a fire.

Consider limiting the size and number of windows in your home that face large areas of vegetation.

**Inside:** Keep working fire extinguishers on hand.


Install smoke alarms on each level of your home and in bedrooms. Test them monthly and change the batteries twice a year.

**Address:** Make sure your address is clearly visible from the road.

**Decks:** Surfaces within 10 feet of the building should be built with ignition resistant, non-combustible, or other approved materials.

Ensure that all combustible items are removed from underneath your deck.





**Garage:** Have a fire extinguisher and tools such as a shovel, rake, bucket and hoe available for fire emergencies.

Consider installing weather stripping around and under door to prevent ember intrusion.

Store all combustibles and flammable liquids away from ignition sources.

**Driveways and Access Roads:** Driveways should be built and maintained in accordance to the state and local codes to allow fire and emergency vehicles to reach your house.

Consider maintaining access roads with a minimum 10-foot clearance on either side of the traveled section of the roadway and allowing for two-way traffic.

Ensure that all gates open inward and are wide enough to accommodate emergency equipment.

Trim trees and shrubs overhanging the road to allow emergency vehicles to pass.

**Fencing:** Consider using ignition resistant or non-combustible fencing to protect your home during a wildfire.

**Eaves and Soffits Protection:** Eaves and soffits should be protected with ignition resistant or non-combustible materials .

**Rain Gutters:** Screen or enclose rain gutters to prevent accumulation of plant debris.

**Water Supply:** Consider having multiple garden hoses that are long enough to reach any area of your home and other structures on your property. If you have a pool or well, consider a pump.

**Patio Cover:** Use the same ignition resistant materials for patio covering as a roof.

**Walls:** Wood products, such as boards, panels or shingles, are common siding materials. However, they are combustible and not good choices for fire-prone areas.

Build or remodel with ignition resistant building materials, such as stucco, fiber cement, wall siding, fire retardant, treated wood, or other approved materials.

Be sure to extend materials from foundation to roof.

**Chimney:** Cover your chimney and stovepipe outlets with an approved spark arrestor non-combustible screen with openings no smaller than 3/8 inch and no larger than 1/2 inch to prevent embers from escaping and igniting a fire.

Make sure that your chimney is at least 10 feet away from any tree branches.



# READY, SET, GO!

## Create Your Own Wildfire Action Plan

Now that you've done everything you can to protect your house, it's time to prepare your family. Your **Wildfire Action Plan** must be prepared with all members of your household well in advance of a fire.

Use these checklists to help you prepare your Wildfire Action Plan. Each family's plan will be different, depending on their situation.

Once you finish your plan, practice it regularly with your family and keep it in a safe and accessible place for quick implementation.

## GET READY

### Prepare Your Family

- ☐ Create a **Family Disaster Plan** that includes meeting locations and communication plans and practice it regularly. Include in your plan the evacuation of large animals such as horses.
- ☐ Have fire extinguishers on hand and train your family how to use them.
- ☐ Ensure that your family knows where your gas, electric and water main shut-off controls are and how to use them.
- ☐ Plan several different evacuation routes.
- ☐ Designate an emergency meeting location outside the fire hazard area.
- ☐ Assemble an emergency supply kit as recommended by the American Red Cross.
- ☐ Appoint an out-of-area friend or relative as a point of contact so you can communicate with family members who have relocated.
- ☐ Maintain a list of emergency contact numbers posted near your phone and in your emergency supply kit.
- ☐ Keep an extra emergency supply kit in your car in case you can't get to your home because of fire.
- ☐ Have a portable radio or scanner so you can stay updated on the fire.



# GET SET

## As the Fire Approaches

- ☐ Evacuate as soon as you are set!
- ☐ Alert family and neighbors.
- ☐ Dress in appropriate clothing (i.e., clothing made from natural fibers, such as cotton, and work boots). Have goggles and a dry bandana or particle mask handy.
- ☐ Ensure that you have your emergency supply kit on hand that includes all necessary items, such as a battery powered radio, spare batteries, emergency contact numbers, and ample drinking water.
- ☐ Stay tuned to your TV or local radio stations for updates, or check the fire department Web site.
- ☐ Remain close to your house, drink plenty of water and keep an eye on your family and pets until you are ready to leave.

### INSIDE CHECKLIST

- ☐ Shut all windows and doors, leaving them unlocked.
- ☐ Remove flammable window shades and curtains and close metal shutters.
- ☐ Remove lightweight curtains.
- ☐ Move flammable furniture to the center of the room, away from windows and doors.
- ☐ Shut off gas at the meter. Turn off pilot lights.
- ☐ Leave your lights on so firefighters can see your house under smoky conditions.
- ☐ Shut off the air conditioning.

### OUTSIDE CHECKLIST

- ☐ Gather up flammable items from the exterior of the house and bring them inside (e.g., patio furniture, children's toys, door mats, etc.) or place them in your pool.
- ☐ Turn off propane tanks.
- ☐ Don't leave sprinklers on or water running - they can waste critical water pressure.
- ☐ Leave exterior lights on.
- ☐ Back your car into the driveway. Shut doors and roll up windows.
- ☐ Have a ladder available.
- ☐ Patrol your property and extinguish all small fires until you leave.
- ☐ Seal attic and ground vents with pre-cut plywood or commercial seals if time permits.

### IF YOU ARE TRAPPED: SURVIVAL TIPS

- ☐ Shelter away from outside walls.
- ☐ Bring garden hoses inside house so embers don't destroy them.
- ☐ Patrol inside your home for spot fires and extinguish them.
- ☐ Wear long sleeves and long pants made of natural fibers such as cotton.
- ☐ Stay hydrated.
- ☐ Ensure you can exit the home if it catches fire (remember if it's hot inside the house, it is four to five times hotter outside).
- ☐ Fill sinks and tubs for an emergency water supply.
- ☐ Place wet towels under doors to keep smoke and embers out.
- ☐ After the fire has passed, check your roof and extinguish any fires, sparks or embers.
- ☐ Check inside the attic for hidden embers.
- ☐ Patrol your property and extinguish small fires.
- ☐ If there are fires that you can not extinguish with a small amount of water or in a short period of time, call 9-1-1.



By leaving early, you give your family the best chance of surviving a wildfire. You also help firefighters by keeping roads clear of congestion, enabling them to move more freely and do their job.

## WHEN TO LEAVE

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Leave early enough to avoid being caught in fire, smoke or road congestion. Don't wait to be told by authorities to leave. In an intense wildfire, they may not have time to knock on every door. If you are advised to leave, don't hesitate!

## WHERE TO GO

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Leave to a predetermined location (it should be a low-risk area, such as a well-prepared neighbor or relative's house, a Red Cross shelter or evacuation center, motel, etc.)

## HOW TO GET THERE

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Have several travel routes in case one route is blocked by the fire or by emergency vehicles and equipment. Choose an escape route away from the fire.

## WHAT TO TAKE

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Take your emergency supply kit containing your family and pet's necessary items.

## EMERGENCY SUPPLIES

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The American Red Cross recommends every family have an emergency supply kit assembled long before a wildfire or other emergency occurs. Use the checklist below to help assemble yours. For more information on emergency supplies, visit the American Red Cross Web site at [www.redcross.org](http://www.redcross.org).

- ☐ Three-day supply of water (one gallon per person per day).
- ☐ Non-perishable food for all family members and pets (three-day supply).
- ☐ First aid kit.
- ☐ Flashlight, battery-powered radio, and extra batteries.
- ☐ An extra set of car keys, credit cards, cash or traveler's checks.
- ☐ Sanitation supplies.
- ☐ Extra eyeglasses or contact lenses.
- ☐ Important family documents and contact numbers.
- ☐ Map marked with evacuation routes.
- ☐ Prescriptions or special medications.
- ☐ Family photos and other irreplaceable items.
- ☐ Easily carried valuables.
- ☐ Personal computers (information on hard drives and disks).
- ☐ Chargers for cell phones, laptops, etc.

Note: Keep a pair of old shoes and a flashlight handy in case of a sudden evacuation at night.



Write up your Wildfire Action Plan and post it in a location where every member of your family can see it. Rehearse it with your family.

## My Personal Wildfire Action Plan

During High Fire Danger days in your area, monitor your local media for information on brush fires and be ready to implement your plan. Hot, dry and windy conditions create the perfect environment for a wildfire.

### Important Phone Numbers:

Out-of-State Contact: \_\_\_\_\_ Phone: \_\_\_\_\_

Work: \_\_\_\_\_

School: \_\_\_\_\_

Other: \_\_\_\_\_

Evacuation Routes: \_\_\_\_\_

\_\_\_\_\_

Where to go: \_\_\_\_\_

\_\_\_\_\_

Location of Emergency Supply Kit: \_\_\_\_\_

\_\_\_\_\_

Notes: \_\_\_\_\_

\_\_\_\_\_



California Department of Forestry and Fire Protection

**If you have an emergency, call 911**

CAL FIRE: 916-653-5123

Web site: <http://www.fire.ca.gov>



# READY, SET, GO!



This booklet has been adapted from the original,  
created by the Ventura County Fire Department.





# **EXHIBIT 6**

# Getting Out Alive

Preparing  
for wildfire  
and  
evacuation  
in the  
Wildland  
Urban  
Interface



[www.rsf-fire.org](http://www.rsf-fire.org)



# Living with Wildfire

The Rancho Santa Fe Fire Protection District contains multiple communities nestled within the wildland urban interface, areas where wildland vegetation is intermixed with structures. As we saw in October 2007, warm climate, dense brush, flammable vegetation, drought conditions, and steep terrain combine for a volatile wildfire equation.

When living within the wildland urban interface, planning ahead for wildfires is a necessity. Fire strikes without warning and moves alarmingly fast, often leaving residents with limited time to gather household belongings and mementos. More and more communities are being developed within wildland-urban interface areas, placing people, pets, and homes at risk of succumbing to wildfire. Every year, communities throughout San Diego County experience the devastation of such disasters, which is not surprising when you consider the fact that 1/3 of all homes in San Diego County are located in the wildland urban interface.

Preparing for wildfires before they happen is your best defense against the flames. This brochure offers tips to help you prepare for potential wildfires to ensure your family and pets make a safe escape from wildfire, including information about developing an emergency plan, what to do if you have to evacuate, and what to do if you are not able to evacuate.



2007 Witch Creek Fire



# Before Disaster Strikes

The best way to protect your home from wildfire is to prepare before disaster strikes.

- Remove leaves and other debris from your roof and rain gutters.
- Keep 100 feet of “defensible space” around your home. Trim trees and vegetation away from the exterior of your home, rooftop, and chimney(s).
- Thin out combustible vegetation within 30 feet of roadways and driveways.
- Remove dead, dying, or diseased trees.
- Trim tree branches 10 feet from rooftops, chimneys, and outdoor barbecues.
- Dispose of yard clippings, plant waste, trash, debris, and other combustible materials in an appropriate manner.
- Replenish dead and dying vegetation with fire-resistant trees and plants; do not replant with flammable vegetation.
- Combustible material must be kept at least 10 feet away from propane tanks.
- Firewood should be neatly stacked with a minimum of 30 feet of clearance from structures.
- Private gates must be equipped with an approved fire district gate access switch and/or strobe sensor.



2007 Witch Creek Fire

Additionally, all new construction within the fire protection district must be built to ignition-resistant standards and must remain that way. Even when remodeling or putting an addition on to your existing home, be sure your plans match these guidelines:

- Exterior walls must be fire-resistant. Any wood siding must be treated or ignition resistant.
- Eaves must be boxed or constructed of heavy timber and all vents must be screened to prevent fire embers from entering the inside of your home.
- Windows must be dual-pane or tempered glass.
- Chimneys must have spark arrestors with a minimum ½” screen.



2007 Witch Creek Fire  
Good defensible space

- Residential fire sprinkler systems must be maintained.
- Roof must be comprised of Class-A, non-combustible materials like tile, slate, cement, asphalt or metal. No wood shingles.
- Wood fences should be at least 5 feet from your home.
- Trellises, patio covers and other auxiliary structures must be made with non-combustible materials. Minimum timber size requirements are 4” x 6”, and columns must be masonry and stucco or precast concrete. The structure’s covering must remain at least 50% open, or Class-A roof is required.
- Decks should be non-combustible or constructed of heavy timber or fire retardant-treated wood.
- Landscape MUST be fire-resistant and well-maintained.

# Evacuation Route Map

Wildfire fatalities most commonly occur when people leave their home too late or are over-taken by fire. If you live in an area that's at high risk for wildfire, it's important for you to plan your evacuation route now, before an emergency situation arises.

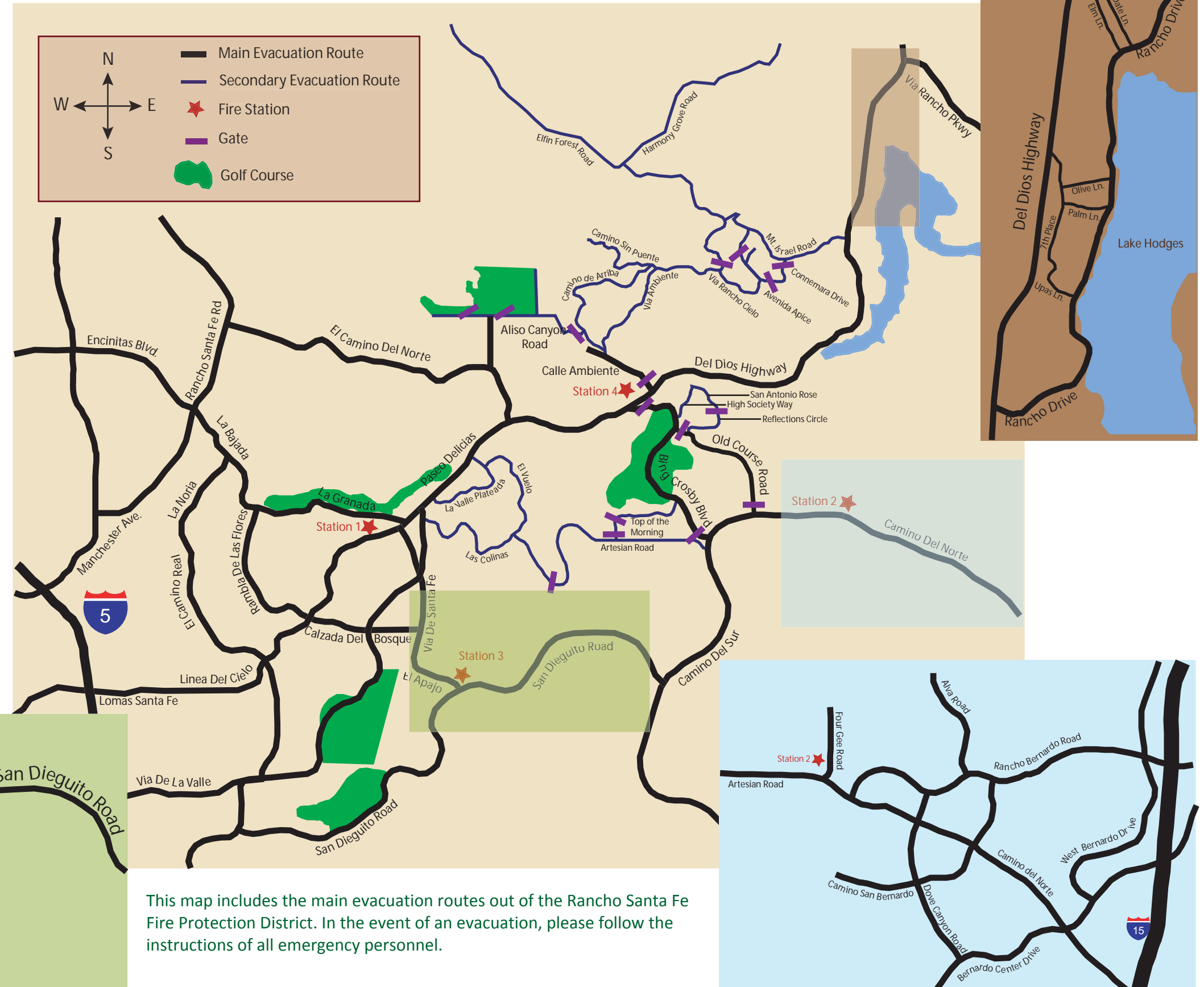
Relocate early enough to avoid being caught in fire, smoke or road congestion. Don't wait to be told by authorities to leave. In an intense wildfire, they may not have time to knock on every door. If you are advised to evacuate, don't hesitate!

"Should I stay or should I go Quiz":

- Are you physically fit to fight spot fires in and around your home for up to 10 hours or more?
- Are you and your family members mentally, physically and emotionally able to cope with the intense smoke, heat, stress and noise of a wildfire while defending your home?
- Can you protect your home while also caring for members of your family, pets, etc.?
- Do you have the necessary resources, training, and properly maintained equipment to effectively fight a fire?
- Does your home have defensible space of at least 100 feet and is it cleared of flammable materials and vegetation?
- Is your home constructed of ignition resistant materials?

If you answered "No" to any of these questions, then plan to evacuate early.

**REMEMBER:** By evacuating early, you give your family the best chance of surviving a wildfire. You also help firefighters by keeping roads clear of congestion, enabling them to move more freely and do their job.



# Develop a Plan

An emergency plan is an essential for a safe and methodical evacuation during a disaster. Prepare, review, and practice your evacuation plan with your family before an emergency situation occurs.

When designing your plan with your family, be sure to include the following:

- Identify a minimum of two (2) main exit routes from your neighborhood. Map out alternative routes in the event main routes are blocked. (There is a map of the immediate area provided on pages 4 and 5).
- Know the location of safe zones (such as golf courses or large open fields) and evacuation centers in the area during wildfire or other disaster situations.
- Make a list of “IMPORTANT ITEMS” that cannot be left behind:
  - Medications, prescriptions and eyeglasses
  - Important documents (e.g., birth certificates, tax records, etc.)
  - Photos, art, jewelry and other important mementos
  - Pets, pet food, leash(es), pet carrier(s)
  - Emergency Supply Kit (Sample checklist enclosed)
  - Cell phones, wallets, and other essential personal items
- Designate a relative or friend as an out-of-area contact through whom family members can relay information. Long-distance phone systems are often operational when local phone communications are overloaded.
- Plan how you will transport your pets. Make sure all your animals are wearing either a license or identification tag. Consider having your animals micro-chipped for identification purposes. PLEASE NOTE: If you own large animals, such as horses and livestock, make arrangements far in advance for their transportation and lodging during an emergency. Train them in advance how to load into trailers quickly and easily. A disaster situation is not the time to trailer-train a horse. DO NOT let horses loose to fend for themselves.
- If you are unable to drive a car, develop a network of neighbors, friends and/or caregivers who can help you prepare for and assist you during a disaster.
- Make a contingency plan should you not be home when wildfire threatens. Make arrangements in advance for people or pets that will be home when you are not. Pre-arrange a family meeting place outside of your neighborhood as well.
- Register your home phone number, cell phone number, and email address with AlertSanDiego, San Diego County’s mass emergency notification system. Registration can be done online at [www.AlertSanDiego.org](http://www.AlertSanDiego.org).



2007 Witch Creek Fire

# Evacuation

The following suggestions will help in the pre-evacuation and evacuation process:

- Wear cotton or wool long pants, long-sleeve shirts or jackets, gloves and a damp cloth to cover your nose and mouth. Do not wear short-sleeve shirts or synthetic fabrics.
- Back your car into the garage (facing out) keeping the windows closed and keys in the ignition.
- Close the garage door, but leave it unlocked. Disconnect the automatic garage door in case of power failure.
- Place valuable documents, family mementos, pets and other valuables in your car in the garage for a quick departure.
- Move yard furniture, firewood, or other combustible materials away from the exterior of the house or store it in the garage.



- Attach garden hoses to spigots. Place hoses so they can reach any area around your home.
- Fill sinks, bathtubs and buckets with water to serve as extra water reservoirs.
- To eliminate the possibility of sparks blowing into hidden areas within the house, close window shutters if they are fire resistant and cover windows, attic openings, eave vents and sub-floor vents with fire resistant material such as 1/2-inch or thicker plywood.
- If you have one, place an aluminum ladder against the house on the side opposite the approaching fire to help firefighters access your roof quickly.
- Close all windows and doors to prevent sparks from blowing inside. Close all interior doors to slow interior fire spread.
- To make your house more visible in heavy smoke, turn porch and yard lights on and turn on a light in each room of your home.
- Shut off liquefied petroleum gas (LPG) or natural gas valves.
- Most communities within the Rancho Santa Fe Fire Protection District have narrow roads, which can cause traffic congestion leading to panic for those evacuating. Evacuate early.
- You do not need to wait for an evacuation order. If at any time you feel threatened, leave. You may also want to leave early if the evacuation will take a long time, such as if you are evacuating with small children, dependent adults, or large animals.
- If you are told to evacuate, do so immediately. While having your home damaged or destroyed by fire can be devastating, it is not worth risking your life or the lives of firefighters.
- Evacuate in the opposite direction of the fire.
- Do not attempt to pick up children from school or daycare. Staff members are trained to protect your children and will institute proper emergency procedures on site.
- Call your out-of-town contact and let them know you are evacuating and where you are going.
- Once you have left, stay out of the area until authorities permit re-entry. This may take a while as fire and safety personnel have to make sure it is safe and the infrastructure is in place for residents to repopulate the area.

## If You Can't Evacuate

If the fire approaches too rapidly for you to be able to safely evacuate from the area, your home is the safest place for you to seek shelter in which to wait out the fire. The following outlines the safest way to shelter-in-place:

- Stay indoors and wait for the wildfire-front to pass, usually within 30 minutes.
- Call your out-of-town emergency contact to let them know you are sheltering-in-place. If local phone lines go down, try using a cellular phone as an alternative, or correspond via email if possible.
- Shelter in rooms at the opposite end of your home from where the fire is approaching. Stay away from the perimeter walls.
- If the interior of your home catches fire, go to a neighbor's home.
- Once the fire front has passed, thoroughly check your home, yard, roof, attic, etc. for fire. Use a garden hose or fire extinguisher to extinguish any spot fires or smoldering embers.



2007 Witch Creek Fire

*For further information on Sheltering-in-Place, you may contact the Fire District, 858-756-5971.*

# Emergency Supply Kit

Emergency supply kits can be used for various disaster situations like wildfires, earthquakes and floods. Supplies should be stored in easy-to-carry crates or backpacks. Your emergency supply kit should be updated twice annually and contain the following items:

- ☐ A 3-day water supply providing one gallon of water per person, per day
- ☐ A 3-day non-perishable food supply including a can opener and kitchen utensils
- ☐ One change of clothing and shoes per person
- ☐ Enough blankets and/or a sleeping bag for each person
- ☐ First aid kit, including family prescriptions and spare eyeglasses
- ☐ Emergency tools and work gloves
- ☐ A battery-powered radio or television and extra batteries
- ☐ Flashlights with extra batteries
- ☐ Matches and/or a lighter kept in a water-proof container
- ☐ Sanitation and hygiene items
- ☐ Special items for infants, seniors and those with disabilities
- ☐ A credit card and cash; personal identification; extra set of car and house keys
- ☐ Extra pet food, leash(es), and enough pet carriers to transport all pets
- ☐ Sunglasses and/or goggles (for high wind and blowing embers)
- ☐ Entertainment (e.g. books, games for the family, or child's favorite toy)
- ☐ Cell phone and charger
- ☐ Computer, hard drive, or laptop (with charger)
- ☐ Prescriptions, medications
- ☐ Important documents, including birth certificates, passports, and insurance records
- ☐ Jewelry
- ☐ Additional items:

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# **EXHIBIT 7**

**FIRE PROTECTION PLAN**  
**Harmony Grove Village South**  
**APNs: 235-011-06-00, 238-021-08 through 10**



*Prepared for:*

**County of San Diego**

*On behalf of Applicant:*

**Comstock Homes Management Hg, LLC**

321 12th Street, Suite 200

Manhattan Beach, California 92066-5354

*Contact: David Kovach*

*Prepared by:*

**DUDEK**

605 Third Street, Encinitas, California 92024

*Contact: Michael Huff, Project Manager*

A handwritten signature in black ink, reading "Michael Huff". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

**MARCH 2015**



# Harmony Grove Village South Fire Protection Plan

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# Harmony Grove Village South Fire Protection Plan

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## 1 EXECUTIVE SUMMARY

This Fire Protection Plan (FPP) evaluates the proposed Harmony Grove Village South (HGVS) project, to ensure it does not unnecessarily expose people or structures to fire risks and hazards. The approximately 111-acre project is located in the unincorporated portion of San Diego County in the community of Harmony Grove, approximately 2.5 miles west of Interstate 15 (I-15) and approximately 2.6 miles south of State Route 78 (SR-78). The project site is bounded by Escondido Creek to the north, Country Club Drive to the west, and the Del Dios Highland Preserve to the south. Existing rural residential development is located to the west and to the east. The Harmony Grove Village, a 470 acre residential development is currently under construction to the north.

The HGVS project meets or exceeds all fire and building code requirements except one; the project provides mitigations for secondary access that does not meet the strict definition of the Fire Code. This FPP provides detailed discussion of the secondary access requirements and how the project meets the intent of the code through a layered and redundant fire protection and evacuation system.

Currently, the only access to the project site is provided by Country Club Drive and consists of a sub-standard Arizona crossing that serves sixty existing residents to the west of the HGVS site. HGVS will improve the Arizona crossing to a bridge that exceeds County of San Diego standards. Fire protection will be provided from the new fire station being built in the Harmony Grove Village project to the north that is within 1.2 miles from the most distant portion of HGVS. The project will provide fair-share funding for fire and emergency medical response through participation in a County Service Area (CSA) or through fire assessments and fees, depending on the final fire station jurisdiction. It is anticipated that the new station will be staffed by career personnel provided by the Rancho Santa Fe Fire Protection District (RSFFPD) or the San Diego County Fire Authority (SDCFA). The RSFFPD and the Elfin Forest/Harmony Grove Volunteer Fire Departments have submitted an application to the Local Area Formation Committee (LAFCO) that, if approved, will expand the RSFFPD to cover the project area.

The project includes a mix of up to 457 residential units, limited commercial, private recreational areas, manufactured slopes, landscaped areas, natural-appearing drainages, public trails, and biological open space that does not intermingle within the developed areas. The project would require the construction of on- and off-site infrastructure improvements associated with roads, water, and sewer.

The HGVS property lies within an area statutorily designated State Responsibility Area (SRA) “Very High Fire Hazard Severity Zone (VHFHSZ),” by CAL FIRE and the County of San Diego. The site’s vegetation is primarily non-native, disturbed grasses in the development area

## Harmony Grove Village South Fire Protection Plan

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with Southern mixed chaparral on the steep slopes at the southern end of the property. Off-site, adjacent areas include chaparral to the south and disturbed/developed areas to the east, west and north. The area, like all of San Diego County, is subject to seasonal weather conditions that can heighten the likelihood of fire ignition and spread; however, considering the site's location, would be expected to result in spotty, potentially fast moving and primarily low- to moderate-intensity wildfire.

## 2 INTRODUCTION

This FPP has been prepared for the proposed HGVS project in unincorporated San Diego County, California. The purpose of the FPP is to assess the potential impacts resulting from wildland fire hazards and identify the measures necessary to adequately mitigate those impacts. As part of the assessment, this plan has considered the fire risk presented by the site including: property location and topography, geology (soils and slopes), combustible vegetation (fuel types), climatic conditions, fire history and the proposed land use and configuration. This FPP addresses water supply, access (including secondary/emergency access), structural ignitability and ignition resistive building features, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management. This plan identifies fuel modification/management zones and recommends the types and methods of treatment that will protect this project and its essential infrastructure. In addition, this FPP recommends enhanced fire protection measures that the Homeowner's Association (HOA) and individual property owners will take to reduce the probability of structural ignition throughout the project.

This FPP is consistent with the County Consolidated Fire Code (2014 CCFC and 2014 CFC Ordinance #10337). The 2014 CCFC was certified as a package with the County Building Code by the State Board of Forestry to be consistent with California Code of Regulations, Title 14, Fire Safe Regulations. Since the project is within SRA, Title 14 is applicable, but the certified CCFC is now used in lieu of Title 14.

The purpose of this plan is to generate and memorialize the fire safety requirements of the Fire Authority Having Jurisdiction (FAHJ), namely the SDCFA and RSFFPD upon annexation. Recommendations for effectively mitigating identified impacts are based on site-specific characteristics and incorporate input from the project applicant and SDFCA. This FPP incorporates applicable fire safety regulations and requirements and documents a selection of these regulations that are most pertinent to the Project's unique residential development and location.

### 2.1 Project Summary

#### 2.1.1 Location

HGVS is located entirely within the unincorporated portion of San Diego County, known as Harmony Grove. The HGVS project site lies within Township 13 south, Range 2 west and Range 3 west in Sections 7, 12, 13, and 18 in the Escondido and Rancho Santa Fe U.S. Geological Survey, 7.5 minute quadrangles. The site is west of the City of Escondido, south of the City of San Marcos and northeast of the community of Rancho Santa Fe (Figure 1). The project is approximately four miles southwest of the intersection of I-15 and SR- 78. The Elfin Forest Preserve is located approximately 0.9 mile to the southwest. The Harmony Grove Village, a



## Harmony Grove Village South Fire Protection Plan

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Master Planned development, consisting of 468 acres that is being developed by Standard Pacific Corporation and is anticipated to be composed of various residential opportunities, an equestrian center, a fire station, trails, parks and a town square occurs directly north of HGVS.

Figure 2 presents the project's site plan including property boundaries, roads, access points, and building locations. The HGVS project site is located on the following Assessor Parcel Numbers: 235-011-06-00, 238-021-08-00, 238-021-09-00 and 238-021-10-00. The entirety of the property lies within the SRA, VHFHSZ, as statutorily designated by the RSFFPD in cooperation with CAL FIRE. Fire hazard designations are based on topography, vegetation, and weather, amongst other factors with more hazardous sites including steep terrain, unmaintained fuels/vegetation, and wildland urban interface (WUI) locations.

### 2.1.2 Project Description

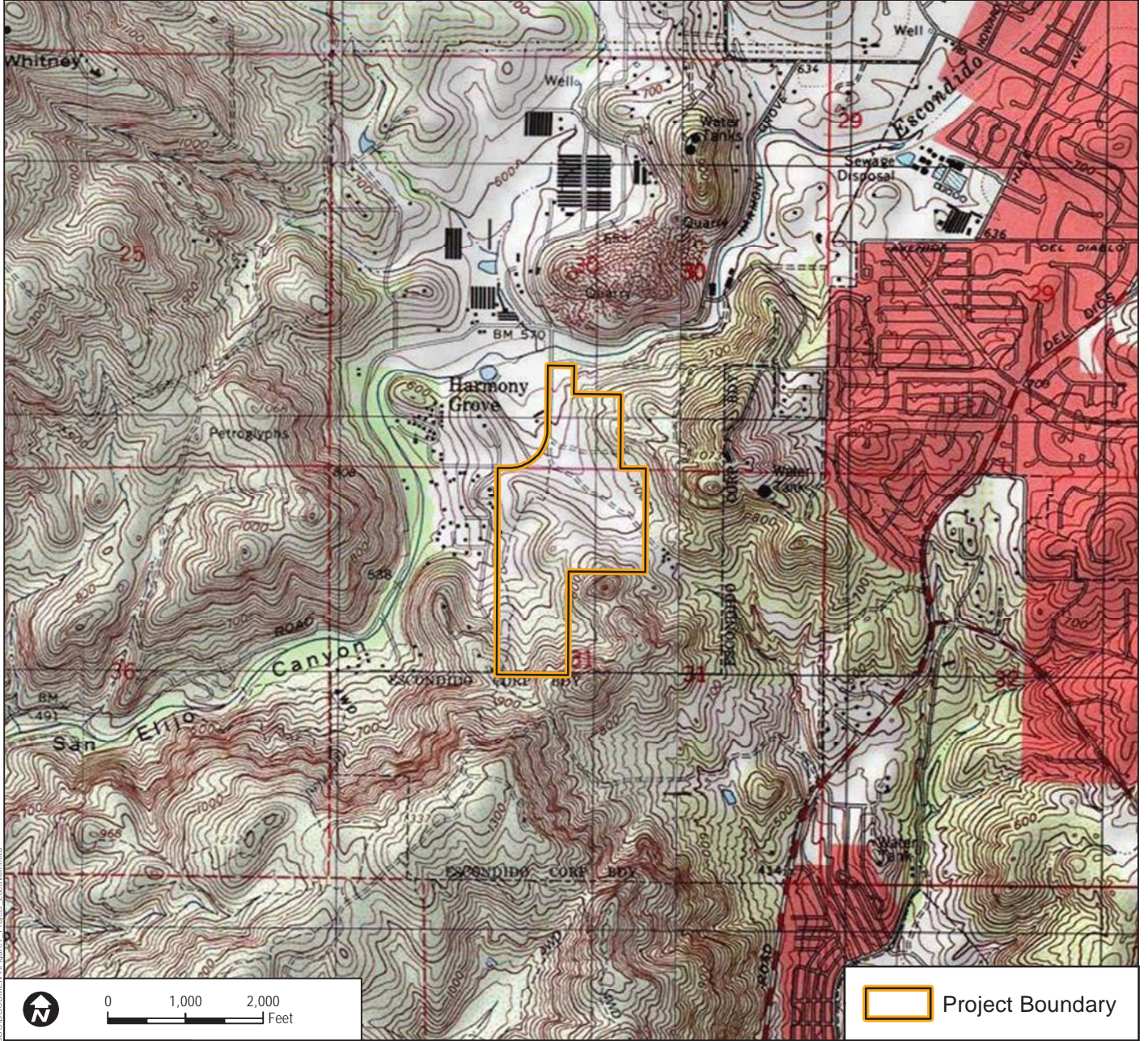
The approximately 111-acre HGVS Project site is bounded by Escondido Creek to the north, Country Club Drive to the west, and the Del Dios Highland Preserve to the south. Existing rural residential development is located to the west and to the east. Harmony Grove Village (currently under construction) is located to the north, across from Harmony Grove Road. Primary access to the project site is provided by Harmony Grove Road and Country Club Drive.

The project proposes:

- A Tentative Map to subdivide the property into a maximum 457 lots;
- A Specific Plan to provide detail on proposed uses;
- A Re-zone from A70 (Limited Agriculture) to S88 (Specific Plan);
- A General Plan Amendment to include the VRTBD (Village Residential) land use designation; and
- A Major Use Permit for an on-site waste water treatment/water reclamation facility.

The project includes a mix of up to 457 residential units, limited commercial, private recreational areas, manufactured slopes, landscaped areas, natural-appearing drainages, public trails, fuel modification, and biological open space. The project would require the construction of on- and off-site infrastructure improvements associated with roads, water, and sewer. Appendix A provides photographs of the site in its current, undeveloped condition.





Path: Z:\Project\31815901\MAPDOC\DOCUMENT\Figure1\_Protect\_Location.mxd

**DUDEK**

SOURCE: USGS 7.5-Minute Series Rancho Santa Fe Quadrangle.

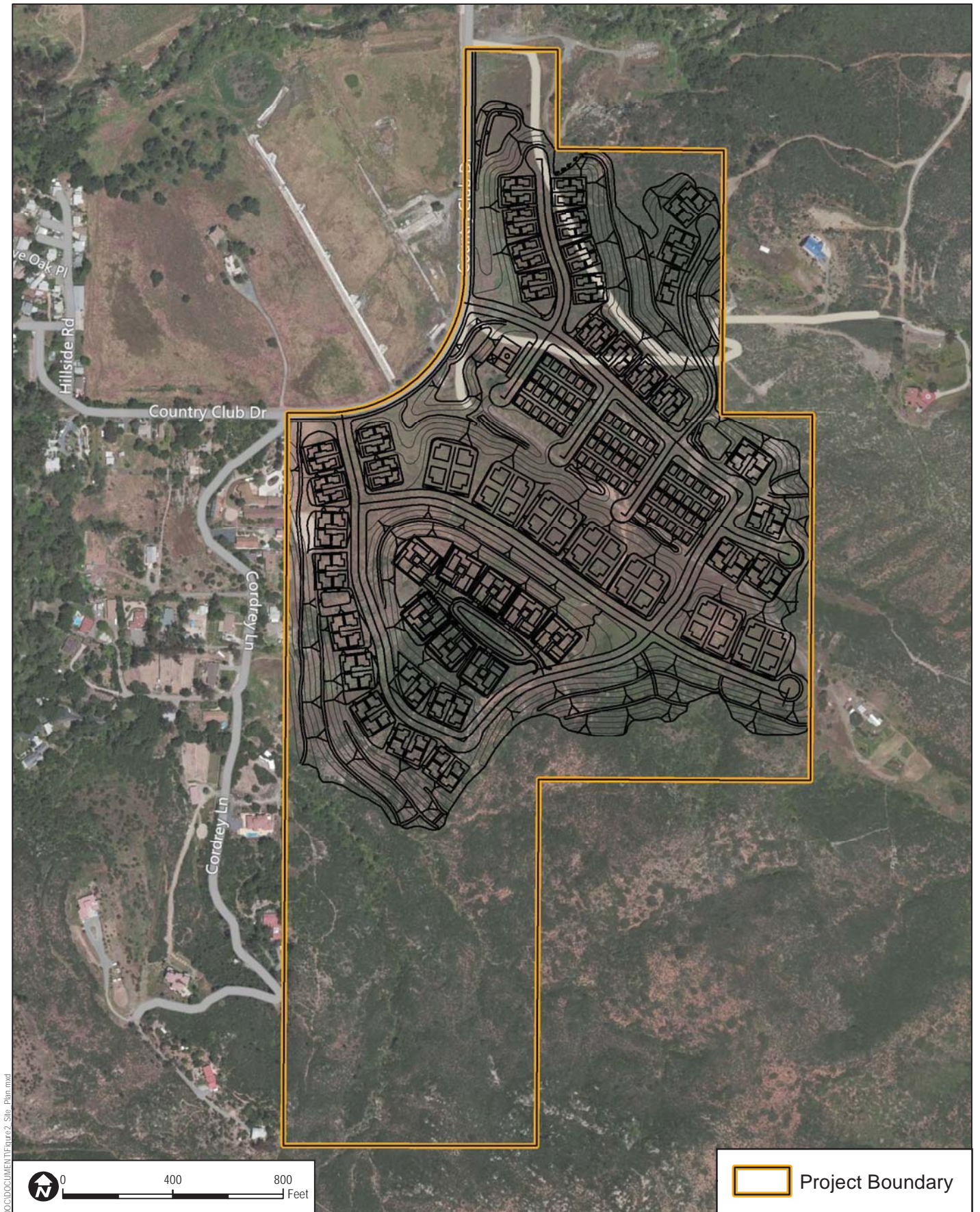
**FIGURE 1**  
**Project Location Map**

## Harmony Grove Village South Fire Protection Plan

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 Project Boundary

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## Harmony Grove Village South Fire Protection Plan

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### 2.1.3 Environmental Setting

Dudek conducted a field assessment of the project site, including on-site and off-site adjacent areas, on September 30, 2014, in order to document existing site conditions and determine potential actions for addressing the protection of proposed structures on the site.

Assessment of the area's topography, natural vegetation and fuel loading, fire history, and general susceptibility to wildfire formed the basis of the site risk assessment. The field tasks included:

- Topographic features documentation
- Vegetation/fuel documentation and measurements
- Existing infrastructure evaluations
- Documentation of the existing condition
- Surrounding land use confirmations
- Necessary fire behavior modeling data collection
- Photograph documentation.

#### 2.1.3.1 Topography

The Harmony Grove Village South project site is an irregularly shaped parcel that includes a relatively flat valley "floor" flanked by more rugged terrain to the south, east and west. The majority of the site is relatively flat with approximately 77 acres ranging between zero and 25% slope. An estimated 33.5 acres are between 25% and 50% slope and there is 1/2 acre of extremely steep hillside that exceeds 50%. All of the slopes drain to the northwest towards Escondido Creek, which meanders through San Elijo Canyon to the southwest of the project site. Elevations on the site range from roughly 580 feet above mean sea level (amsl) in the northwestern portion of the property to just over 840 feet amsl in the southeastern portion of the project site.

#### 2.1.3.2 Fuels

Based on the project's Draft Vegetation Map, (Helix Environmental Planning, 2014), there are 10 vegetation communities and land covers within the project site boundaries: Coast live oak woodland, Coastal Sage-chaparral Transition, Diegan Coastal Sage Scrub, Disturbed Habitat, Eucalyptus Woodland, Granitic Southern Mixed Chaparral, Mafic Southern Mixed Chaparral, Non-native Grassland, Non-native Vegetation, and Urban/Developed. The acreage of each of these vegetation communities or land covers are provided in Table 1 and illustrated in Figure 3.



## Harmony Grove Village South Fire Protection Plan

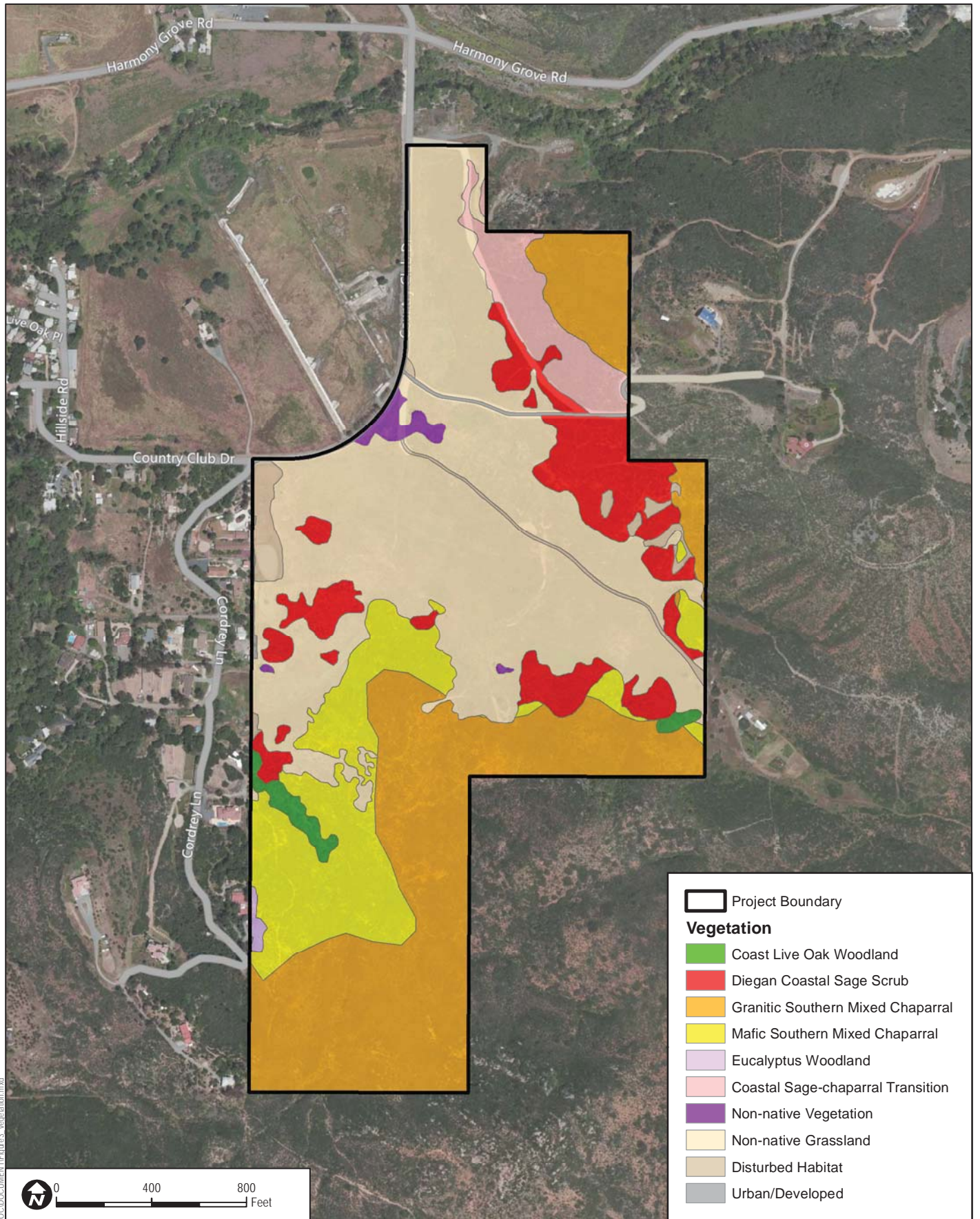
**Table 1**  
**Project Site Vegetation Communities and Land Covers**

<b>Vegetation Community/Land Cover</b>	<b>Acres</b>
Coast Live Oak Woodland	1.146
Coastal Sage-chaparral Transition	4.479
Diegan Coastal Sage Scrub	10.876
Disturbed Habitat	2.379
Eucalyptus Woodland	0.260
Granitic Southern Mixed Chaparral	32.279
Mafic Southern Mixed Chaparral	14.074
Non-native Grassland	43.547
Non-native Vegetation	0.827
Urban/Developed Land	1.221
<b>Total</b>	<b>111.088</b>

Vegetation communities of concern are those that are more likely to facilitate fire spread that occur adjacent to the proposed development. Three off-site vegetation communities (Coast Live Oak Woodland, Diegan Coastal Sage Scrub, and Southern Mixed Chaparral) were identified as potentially facilitating fire spread toward project residences. The following descriptions provide an overview of these three vegetation types.

### **Coast Live Oak Woodland**

This woodland is dominated by Coast live oak (*Quercus agrifolia*), an evergreen oak that reaches 10-25 m in height. The shrub layer is poorly developed, but may include toyon (*Heteromeles arbutifolia*), *Ribes* spp., or laurel sumac (*Rhus laurina*). The ground cover component is continuous and dominated by annual grasses and several other introduced taxa. The Coast live oak woodland dominates the riparian corridor to the west of the site. The oak trees have experienced a recent fire (2014 Cocos Fire) and have many dead leaves in the canopies. Trunks are also blackened by the fire. Many of the trees are expected to recover while some will be lost.



**FIGURE 3**  
**Project Site Vegetation**

## Harmony Grove Village South Fire Protection Plan

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## Harmony Grove Village South Fire Protection Plan

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### Diegan Coastal Sage Scrub

Diegan coastal sage scrub is one of two major shrub types in southern California, occupying xeric sites characterized by shallow soils. Coastal sage scrub is dominated by drought-deciduous shrub species with relatively shallow root systems and open canopies. This vegetation community often contains a substantial herbaceous component and leaf litter layer. Dominant species within Diegan coastal sage scrub on site include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and black sage (*Salvia mellifera*). The height of the shrub layer is currently 2–3 feet. This vegetation type had a light build-up of grasses or forbs underneath the shrub canopies. Diegan coastal sage scrub habitat occurs to the east and southeast of the proposed development.

### Southern Mixed Chaparral

Southern mixed chaparral is the most abundant vegetation type on the slopes to the south and west of the project site. Southern mixed chaparral is composed of broad-leaved sclerophyllous shrubs that can reach heights of 12 feet. The shrubs are generally deep rooted, with well-developed soil litter layer, and high canopy coverage. The composition of the southern mixed chaparral varies with the topography and exposure across the site. Dominant plant species in this vegetation community include chamise (*Adenostoma fasciculatum*), toyon (*Heteromeles arbutifolia*), Wart-stemmed ceanothus (*Ceanothus verrucosus* Nutt.), black sage, and laurel sumac. The vegetative shrubs have a high percentage of dead woody material (roughly 50% to 60%) in shrub canopy due to drought condition.

#### 2.1.3.3 Fuel Model Assignments

The area proposed for development will be converted to a lower flammability, ignition resistant landscape than current conditions. This conversion will include removal of primarily non-native grasses and construction of roads, structures, and irrigated, managed landscape vegetation with the project's construction. Areas outside of the proposed development footprint, such as those within the biological preserve areas and the furthest reaches of fuel modification areas in the thinning zone, can be classified primarily as a mix of Diegan coastal sage scrub, Southern mixed chaparral, and Coastal live oak riparian forest. Table 1 provides a summary of the vegetation and fuel types observed on site, as well as corresponding fuel model assignments for fire behavior modeling conducted for this project, as described in Chapter 3. Figure 3 presents vegetation distribution on the site. Appendix A provides photographs of the site and its vegetative fuels.



## Harmony Grove Village South Fire Protection Plan

**Table 2**  
**Observed Off-Site Vegetative Fuels**

<b>Vegetation Type</b>	<b>Location</b>	<b>Fuel Model Assignment</b>
Diegan coastal sage scrub	On west facing slopes to east of project site.	SCAL 18
Southern Mixed Chaparral	On all slopes surrounding project site. Most abundant vegetative type for Project area.	FM 4
Coast Live oak riparian forest	Oak forest occurs within Escondido Creek, just west of Project area.	FM 9

### **2.1.3.4 Fuel Loads**

The vegetation described above translates to fuel models used for fire behavior modeling, discussed in Chapter 3 of this FPP. Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (leaf size, branching patterns), and overall fuel loading. For example, the native shrub species that compose the two vegetation types on site are considered to exhibit higher potential hazard based on such criteria.

Fuel Loading is important because the intensity of fire tends to increase with the weight or volume of the fuels burned (Biswell 1989). Fuel loading is measured in tons of fuel available per acre. All vegetative fuels have a continuous fuel bed comprised of live and dead woody material. The fuel bed heights ranged from 3-12 feet high. Fine fuel loading in coastal sage scrub is estimated to be 4 to 5 tons/acre, while that in Southern Mixed Chaparral is estimated at 7-10 tons/acre. Fine fuel loading (primarily leaf litter) for oak riparian areas is slightly lower than the sage scrub, estimated at 3.5 tons/acre.

### **2.1.3.5 Fire History**

Fire history is an important component of a site-specific FPP. Fire history information can provide an understanding of fire frequency, fire type, most vulnerable project areas, and significant ignition sources, amongst others. Appendix B illustrates fire history for the Harmony Grove Village South project vicinity. As presented, there have been numerous fires recorded by fire agencies in the direct vicinity of the project site, primarily associated with the open space preserves (Del Dios Highlands Preserve and Park and Elfin Forest Recreational Reserve) to the south of the Project area. One recorded fire has burned on the project site, occurring in 1997 (Del Dios Fire) and the Cocos Fire (2014) burned up to the northwest edge of the property. The average fire return interval for fires burning within 3 miles of the project site is 7 years. Recorded wildfires within 3 miles of the Project range from 28 acres to 162,070 (Witch Fire)

## Harmony Grove Village South Fire Protection Plan

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acres. However, the average fire size is 1,519 acres (not including the Witch Fire, 1943 Un-named Fire or fires smaller than 10 acres). As suggested by the data, a significant fire history exists in the vicinity of the project site but most wildfires are contained by initial or extended attack. Consistent with results throughout large portions of Southern California, Santa Ana wind driven fires present the highest risk of non-containment by initial or extended attack and the occurrence of a major incident. Fire history data was obtained from CAL FIRE's Fire and Resource Assessment Program (FRAP 2014) database.

**Table 3**  
**Fire History within Three Miles of the Project Site**

Fire Year*	Fire Name	Interval (years)	Total Area Burned (acres)
1919	Un-named	N/A	6,693
1943	Un-named	24	40,248
1980	Elfin	37	47
1981	Outside Origin #2	1	4,325
1984	Questhaven	3	29
1985	Israel	1	28
1986	Harmony	1	41
1987	Del Dios	1	217
1988	Hodges #2	1	150
1988	Del Dios #2	0	37
1988	Outside Origin #11	0	247
1989	Harmony	1	143
1990	Paint	1	2,761
1994	Questhaven	4	65
1996	Harmony	2	79
1996	Harmony	0	9,359
1997	Del Dios	1	1073
2007	Coronado Hills	10	59
2007	Witch	0	162,070
2014	Cocos	7	1,995

<sup>1</sup> \*FRAP 2014, Cocos Fire perimeter and information obtained from Cal Fire incident website.

Based on fire history, wildfire risk for the project site is associated primarily with wind-driven fires originating near Lake Hodges (such as along Del Dios Highway) and burning or spotting onto the site from the south. Although a fire approaching from the west during more typical on-shore weather patterns is possible, it would typically occur with higher humidity and fuel moisture levels and lower average wind speed, resulting in a more manageable fire.

## Harmony Grove Village South Fire Protection Plan

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### **2.1.3.6 Climate**

North San Diego County and the project area are influenced by the Pacific Ocean and are frequently under the influence of a seasonal, migratory subtropical high pressure cell known as the “Pacific High.” Wet winters and dry summers with mild seasonal changes characterize the Southern California climate. This climate pattern is occasionally interrupted by extreme periods of hot weather, winter storms, or dry, easterly Santa Ana winds. The average high temperature for the project area is approximately 72°F, with daily highs in the summer and early fall months (July–October) exceeding 95°F. Precipitation typically occurs between December and March with average rainfall of 13 inches.

The prevailing wind pattern is from the west (on-shore), but the presence of the Pacific Ocean causes a diurnal wind pattern known as the land/sea breeze system. During the day, winds are from the west–southwest (sea) and at night winds are from the northeast (land), averaging 2 miles per hour (mph). During the summer season, the diurnal winds may average slightly higher (approximately 16 mph) than the winds during the winter season due to greater pressure gradient forces. Surface winds can also be influenced locally by topography and slope variations. The highest wind velocities are associated with downslope, canyon, and Santa Ana winds, which affect the HGVS site and the region.

Typically the highest fire danger is produced by the high-pressure systems that occur in the Great Basin, which result in the Santa Ana winds of Southern California. Sustained wind speeds recorded during recent major fires in San Diego County exceeded 30 mph and may exceed 50 mph during extreme conditions. The Santa Ana wind conditions are a reversal of the prevailing southwesterly winds that usually occur on a region-wide basis during late summer and early fall. Santa Ana winds are warm winds that flow from the higher desert elevations in the north through the mountain passes and canyons. As they converge through the canyons, their velocities increase. Consequently, peak velocities are highest at the mouths of canyons and dissipate as they spread across valley floors. Santa Ana winds generally coincide with the regional drought period and the period of highest fire danger.

### **2.1.3.7 Current Land Use**

The HGVS site is currently undeveloped. The proposed development portions of the property primarily consist of disturbed ground, non-native grasses and invasive plants. There are two structure foundations on the site that will be removed during grading of the development. Much of the site is now traversable on graded, dirt roads. Additionally, a dirt road provides access through the site to a single residential property to the south of the project boundary.

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### **2.1.3.8 Proposed Land Use**

The HGVS project proposes a mix of up to 457 residential units, limited commercial, private recreational areas, manufactured slopes, landscaped areas, natural-appearing drainages, public trails, and biological open space. The project would require the construction of on- and off-site infrastructure improvements associated with roads, water, and sewer.

The Project proposes:

- A Tentative Map to subdivide the property into a maximum 457 lots;
- A Specific Plan to provide detail on proposed uses;
- A Rezone from A70 (Limited Agriculture) to S88 (Specific Plan);
- A General Plan Amendment to include the VRTBD (Village Residential) land use designation; and
- A Major Use Permit for an on-site waste water treatment/water reclamation facility.

The proposed land use improvements described above would be completed according to the San Diego County Consolidated Fire Code and County Building Code in effect at the time of building plan submittal and would include ignition-resistive construction, interior sprinklers, required fire flow, and a designated fuel modification area, among other requirements as described further in this FPP.



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### 3 DETERMINATION OF PROJECT EFFECTS

FPPs provide an evaluation of the adverse environmental effects a proposed project may have from wildland fire. The FPP must provide mitigation for identified impacts to ensure that development projects do not unnecessarily expose people or structures to a significant loss, injury or death involving wildland fires. Significance is determined by answering the following guidelines:

*Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

The wildland fire risk in the vicinity of the Project site has been analyzed and it has been determined that wildfires may occur in wildland areas to the west, east, south, and southwest of the project site, but would not be significantly increased in frequency, duration, or size with the construction of the project. The developing Harmony Grove project to the north has created a large low-fire risk area in alignment with north/northeast wind directions, reducing the fire threat at the Project site. The existing site includes numerous potential fire issues including unmaintained, non-native vegetation and limited access for approximately 60 residents to the west of HGVS. The Project would include conversion of fuels to developed land with designated landscaping and fuel modification areas and highly ignition resistant structures. As such, the site will be largely converted from readily ignited fuels to ignition resistant landscape.

The types of potential ignition sources that currently exist in the area include vehicles, roadways, illegal recreation users, and off-site residential neighborhoods. The project would introduce potential ignition sources, but would also include conversion of ignitable fuels to lower flammability landscape and include better access throughout the site, managed and maintained landscapes, more eyes and ears on the ground, and generally a reduction in the receptiveness of the area's landscape to ignition. In addition, the Project would enhance access (both ingress and egress) through a multi-tiered approach. Fires from off-site would not have continuous fuels across this site and would therefore be expected to burn around and/or over the site via spotting. Burning vegetation embers may land on Project structures, but are not likely to result in ignition based on ember decay rates that would not impact the types of non-combustible and ignition resistant materials that will be used on site.

The Project would comply with applicable fire and building codes and would include a layered fire protection system designed to current codes and inclusive of site-specific measures that will result in a Project that is less susceptible to wildfire than surrounding landscapes and that would facilitate firefighter and medical aid response as well as project resident evacuation in a wildfire emergency. Given the anticipated maximum fuel loading for the natural areas off site, resulting fire behavior modeling results, which closely mimic reported Fire behavior from the most recent

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fire in the area, the 2014 Cocos Fire, combined with the required ignition resistance construction the risk of wildfire damage to the project site's structures and its residents is considered low.

### ***Would the project result in inadequate emergency access?***

The HGVS is requesting an exception to the 2014 San Diego County Consolidated Fire Code regarding maximum dead end road lengths. The project is requesting a General Plan amendment to re-zone the area into parcels that are less than 1 acre in size, resulting in an allowed maximum dead-end road length of 800 feet. The dead-end road that leads to the most distant structure on HGVS measures about 1.3 miles to the intersection of Harmony Grove and Country Club Drive, the first opportunity to travel in at least two separate directions. This request for modification is based on topographical, geological, and environmental conditions as well as infeasibility of attaining necessary easements for a secondary access that make meeting the regulation unattainable. The project has developed an alternative approach for secondary access that meets the intent of the code through the implementation of a list of specifically developed measures and features (detailed in Section 5.2.1.2 of this FPP). These measures and features provide the ability for the fire authority having jurisdiction to make findings that the intent of the code has been met.

### ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for fire protection?***

The project will be served by the not-yet-constructed, but approved fire station located within the developing Harmony Grove Project which will be staffed by SDCFA or RSFPD. The new station will be less than 1.2 miles from the site with an estimated travel time of less than three minutes to the most distant on-site structure. HGVS would receive very fast travel time from this fire station and can also be largely covered by less than 5 minute travel time by existing Escondido Fire Station #6. Truck coverage from Escondido Station #1 is within 8 minutes travel throughout the HGVS project.

These resources could be provided through automatic and mutual aid agreements, but will depend on the final configuration of the new fire station and which fire agency is providing operation. The following list depicts the closest fire departments and their respective travel times to HGVS.

- The proximity to multiple fire stations ensures firefighters will be able to respond in a timely manner and provide resources in the event of simultaneous incidents. The proximity to career fire departments with multiple stations and resources available within

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County standards is critical to approving a project that is requesting an exception for secondary access. Further, NFPA 1710, sec. 5.7.6.2.1 requires the fire department to have enough firefighters to initiate a direct wildland attack within the first 10 minutes, as well as providing an incident commander and two firefighters on attack lines. As stated previously this project exceeds the minimal NFPA acceptable response standard with at least 4 career fire stations and a Battalion Chief within 10 minutes travel. NFPA 1141 was used to determine the following travel times (include the ISO travel time formula).

1. The approved fire station within Harmony Grove is directly north of HGVS. The location is 1.3 miles total distance (to most distant structure) with a calculated travel time of 2.8 minutes.
2. Escondido Fire Station # 6 is located at 1735 Del Dios Highway and is 2.8 miles away with a travel time of just over 5 minutes.
3. Escondido Station #1 is located at 310 North Quince Street and is 4.2 miles away and has a travel time of 7.9 minutes.
4. Elfin Forest / Harmony Grove Fire Station is located at 20223 Elfin Forest Road and is just under 5 miles away with a travel time of 9.1 minutes.

***Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?***

The project will be served by Rincon del Diablo Municipal Water District (RDDMWD) and sufficient water supplies will be available to serve the project from existing entitlements and resources. The Rincon Water District requires new development to meet a dual 2500 gpm fire flow in the District for a 5,000 gpm. The pressures in the HGVS development will remain above 20 psi when meeting the fire requirements for the Rincon District. Appendix H includes the Project's Facility Water Service Letter.



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### 4 ANTICIPATED FIRE BEHAVIOR

#### 4.1 Fire Behavior Modeling

Following field data collection efforts and available data analysis, fire behavior modeling was conducted to document the type and intensity of fire that would be expected on this site given characteristic site features such as topography, vegetation, and weather. Results are provided below and a more detailed presentation of the modeling inputs and results is provided in Appendix B.

##### 4.1.1 Fuel Models

Fuel Models are simply tools to help fire experts realistically estimate fire behavior for a vegetation type. Fuel models are selected by their vegetation type; fuel stratum most likely to carry the fire; depth and compactness of the fuels; and percent of dead branches or foliage in shrub canopy. Fire behavior modeling was conducted for vegetative types that surround the proposed development. The vegetation types are represented primarily by three fuel models as shown in Table 1. Other fuel models may exist, but not at quantities that significantly influence fire behavior in and around the proposed development. Fuel models were selected from custom and Standard Fire Behavior Fuel Models: a Comprehensive Set for Use with Rothermel's Surface Fire Spread Model (Scott and Burgan 2005).

##### 4.1.2 Fuel Model Output Results

Focused fire behavior modeling utilizing BehavePlus (v. 5.0.5) was conducted for the project site. A more detailed discussion of the BehavePlus analysis, including weather input variables, is presented in Appendix B. Fuel model typing was completed in the field concurrent with site hazard evaluations. Based on field analysis, four different fire scenarios were evaluated for the project site.

- **Scenario 1:** Peak fire weather with off-shore, Santa Ana winds and fire burning in southern mixed chaparral and coastal sage scrub along northeastern and eastern portions of project site.
- **Scenario 2:** Peak fire weather with off-shore, Santa Ana winds and fire burning in a canyon vegetated with southern mixed chaparral and coastal sage scrub to the southeast of project site.
- **Scenario 3:** Summer fire weather with on-shore winds and fire burning in the southern mixed chaparral along southwestern portion of project site.

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- **Scenario 4:** Summer fire weather with on-shore winds and fire burning in the southern mixed chaparral and Coast live oak riparian forest along the western portion of the project site.

The unique terrain and fuel models used for BehavePlus modeling for the Harmony Grove Village South site are presented in Table 3, and the results of modeling efforts are provided in Table 4. Locations of BehavePlus model runs are presented graphically in Figure 4. Based on the BehavePlus analysis, worst-case fire behavior is expected in chaparral-coastal sage scrub fuel beds along the northeast, east, and southeast of the proposed development area under Peak weather conditions (represented by Scenarios 1 and 2). Under such conditions, expected surface flame lengths reach 84 feet during peak weather conditions with wind speeds of 40+ mph. Under this scenario, fireline intensities reach 86,008 BTU/feet/second with moderate to fast spread rates ranging from 2.0 to 17.0 mph. Fires burning from the west or southwest of the proposed development area and pushed by on-shore winds (Summer weather) exhibit less severe fire behavior, with flame lengths reaching 42 feet, fireline intensities reaching 18,922 BTU/feet/second and a spread rate reaching 4.3 mph in dense chaparral-Coast live oak riparian fuel beds.

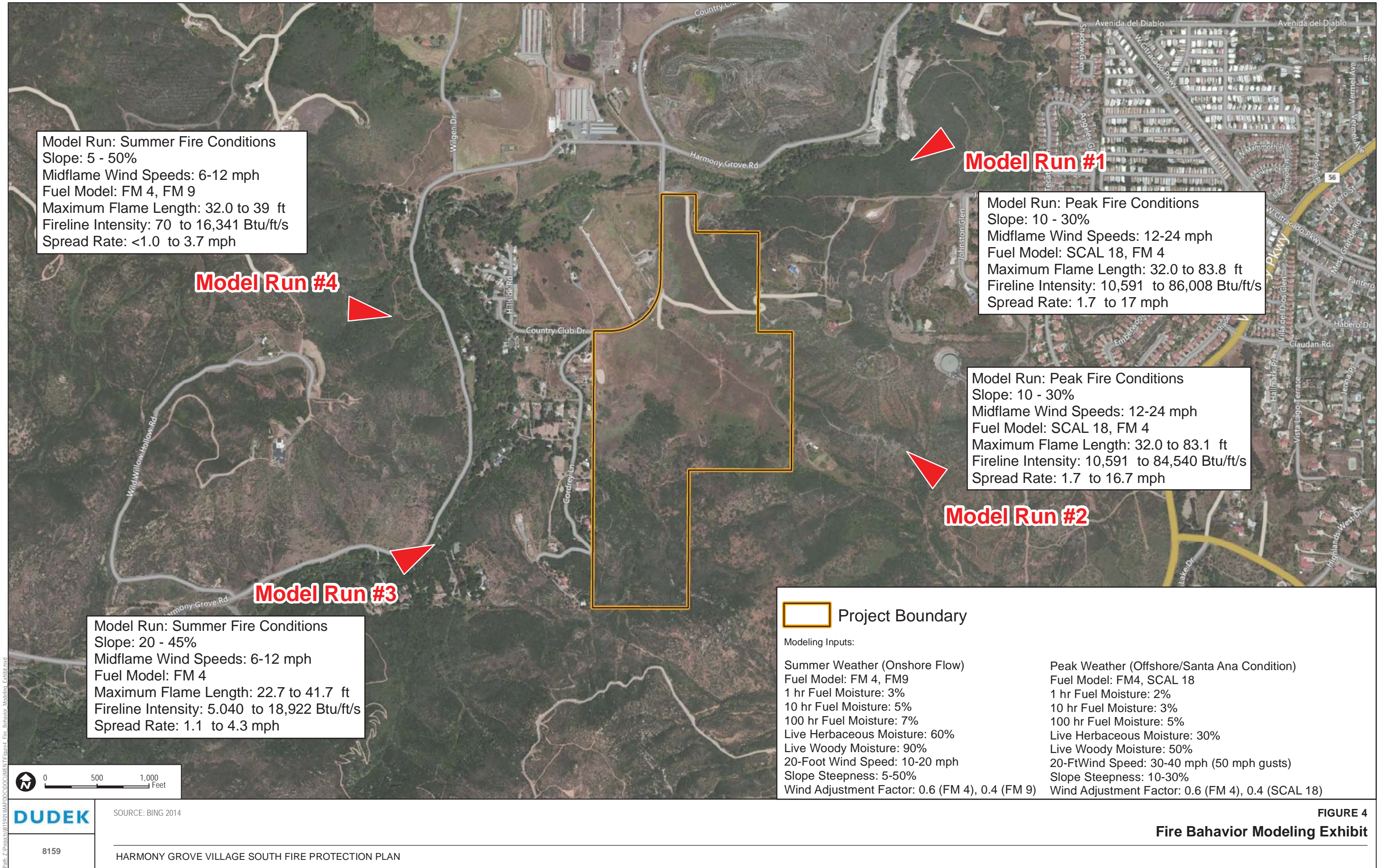
**Table 4**  
**HGVS Fire Behavior Model Variables**

Scenario	Weather	Fuel Model(s)	Slope	Aspect
1	Peak(Off-shore)	Chaparral-sage scrub(FM 4, SCAL 18)	10-30%	North and West
2	Peak (Off-shore)	Chaparral-sage scrub (FM 4, SCAL 18))	10-30%	North and Southwest
3	Summer (On-shore)	Chaparral (FM 4)	20-45%	North and Northeast
4	Summer (On-shore)	Oak riparian-sage scrub (FM 4, FM 9)	5-50%	East

**Table 5**  
**HGVS BehavePlus Fire Behavior Model Results**

Model Runs (Scenario)	Flame Length (feet)	Fireline Intensity (Btu/ft/s)	Surface Rate of Spread (mph)
1	32.0 to 83.8	10,591 to 86,008	1.7 to 17.0
2	32.0 to 83.1	10,591 to 84,540	1.7 to 16.7
3	22.7 to 41.7	5,040 to 18,922	1.1 to 4.3
4	3.2 to 39.0	70 to 16,341	<1.0 to 3.7







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The results presented in Table 4 depict values based on inputs to the BehavePlus software and are not intended to capture changing fire behavior as it moves across a landscape. Changes in slope, weather, or pockets of different fuel types are not accounted for in this analysis. For planning purposes, the averaged worst-case fire behavior is the most useful information for conservative fuel modification design. Model results should be used as a basis for planning only, as actual fire behavior for a given location will be affected by many factors, including unique weather patterns, small-scale topographic variations, or changing vegetation patterns.

Based on the results of fire behavior modeling, a typical fire in the Project vicinity will be a sage scrub-chaparral fueled fire that moves quickly, burning with moderate to high intensity. The fire is anticipated to be a wind-driven fire from the east or north during the fall. Flame lengths in the fuels could reach 84 feet with spread rates reaching approximately 17 mph during fall conditions. A typical cause may be related to structure fires in the neighborhoods to the north and east or roadways (tossed cigarette, car fire, or electrical powerline arching).

### 4.2 On-Site Fire Risk Assessment

Given the climatic, vegetative, WUI, and topographic characteristics and fire history of the area, the project site, once developed, is determined to be subject to occasional off-site wildfires. Potential for off-site wildfire encroaching on, or showering embers on the site is considered moderate to high, but risk of ignition from such encroachments or ember showers is considered low based on the type of construction and fire protection features that will be provided for the structures.

Wildland fire from the east, south, or southwest is possible given the existence of open space reserve lands and ignition sources. The most significant wildfire threat currently is considered to be during Santa Ana conditions with wind-driven wildfire from the northeast/east. However, the Santa Ana threat is considered minimal post-development because there is a lack of wildland fuels to the northeast/east, which is currently being developed for the Harmony Grove Village project. The developed areas of the City of Escondido are located to the east. The most significant threat for this project would be a fire started west or southwest of the site in heavy native vegetation. This type of fire would also have the potential to produce embers and is subject to unstable wind patterns, resulting in eddies and wind/terrain assisted fire runs up side canyons and “chimneys<sup>1</sup>.”

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<sup>1</sup> Steep valleys, chutes, drainages, and similar terrain are sometimes referred to as chimneys.

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The following description summarizes details regarding the site's fire environment and general risk from wildland fire.

- This property is within an area subject to occasional weather extremes that may facilitate wildfire ignition and spread;
- Terrain to the south and west of the project may facilitate the spread of fire due to steep, vegetated slopes.
- The predominant fuel type surrounding the project site is southern mixed chaparral. Fuel loading will be different for north vs. south facing slopes. The fuel load for a southern aspect at a "climax" condition (at community maturity) is considered lighter than on north-facing adjacent slopes based on the southern exposure, which results in hotter and drier conditions and less vegetation growth. Southern facing slopes also become more prone to ignition due to the same factors;
- Santa Ana winds coinciding with the late fall vegetation drying have resulted in some of the largest and most severe wildland fires (e.g., 2007 Witch Fire) in San Diego County and California. Fire history indicates wildfire has occurred on and in the vicinity of the project several times, as described in section 1.1.3.5.

### **5 ANALYSIS OF PROJECT EFFECTS**

#### **5.1 Adequate Emergency Services**

##### **5.1.1 Emergency Response**

The project site is located within Elfin Forest/Harmony Grove Volunteer Fire Department and SRA. The RSFPD and the Elfin Forest/Harmony Grove Volunteer Fire Department have submitted a request to the LAFCO that would allow the new fire station that is being built by Harmony Grove Village to be staffed by RSFFPD. Emergency ambulance service for CSA 17 is outsourced to a private vendor. The proposed new RSFFPD Station is less than 1.3 miles to every structure proposed on the HGVS site and the engine can respond within three minutes travel time, which is within the County's and RSFFPD's response travel time standard of 5 minutes. Further, the requirements described in this FPP are intended to aid firefighting personnel and minimize the demand placed on the existing emergency service system. Appendix D provides the Project Facility Availability Form for Fire.

Generally, in San Diego County each agency is responsible for structural fire protection and CalFire typically provides wildland fire protection within their area of responsibility. However, mutual aid agreements enable non-lead fire agencies to respond to fire emergencies outside their district boundaries. In the Project area, fire agencies cooperate on a statewide master mutual aid agreement for wildland fires and there are mutual aid agreements in place with neighboring fire agencies (north zone agencies and San Diego City) and typically include interdependencies that exist among the region's fire protection agencies for structural and medical responses, but are primarily associated with the peripheral "edges" of each agency's boundary. These agreements are voluntary, as no local governmental agency can exert authority over another.

Table 6 presents a summary of the location, equipment, staffing levels, maximum travel distance, and estimated travel time for the nearby stations that would respond to a fire or medical emergency at the HGVS project. Travel distances are derived from SANGIS Geographic Information System (GIS) road data while travel times are calculated using nationally recognized National Fire Protection Association (NFPA) 1710 and Insurance Services Office (ISO) Public Protection Classification Program's Response Time Standard.



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**Table 6**  
**Summary of HGVS Responding Fire Stations**

Station	Location	Equipment	Staffing	Maximum Travel Distance*	Travel Time**
Escondido FD Station 1	310 North Quince Escondido, California 92029	Paramedic Engine Truck Company Brush Engine Ambulance	27	4.24	7 min 52 sec
Escondido FD Station 6	1735 Del Dios Hwy Escondido, California 92029	Type 1 Engine Brush Engine Ambulance	15	2.76 miles	5 min 21 sec
Elfin Forest/Harmony Grove	20223 Elfin Forest Rd. Elfin Forest, California 92029	2- Type 1 Engines 2-Brush Engines BLS Ambulance	9	4.97 miles	9 min 6 sec
New Harmony Grove Station	Country Club Dr. Escondido, California 92029	TBD	TBD	1.28 miles.	2 min 50 sec

\* Distance measured to most remote portion of project site.

\*\* Assumes travel to the primary project's furthest structure in the southeast, and application of the ISO formula,  $T=0.65+1.7D$  (T = time and D = distance). The ISO response travel time formula discounts speed for intersections, vehicle deceleration and acceleration, and does not include turnout time.

The San Diego County General Plan utilizes a 5 minute response time goal for urban areas and up to a 20 minute or more response time for rural areas. The 5 minutes is for travel time and is based on the time typically involved in a room fire reaching the point of “flashover” where control is very difficult and the critical time following a heart attack or stroke for medical intervention. From a fire perspective, the ignition resistant features and interior sprinklers provided the project’s residences will effectively minimize fires and extend the occurrence of flashover. Sprinklers have proven very effective at limiting interior fires to the room of origin, and by doing so, extending the time needed for firefighter intervention. There is no mitigation for medical emergencies in this area. The project is well within these critical response times. Travel time to the HGVS site for the first responding engine from the new station to the most remote area of the project is within 3 minutes. Secondary response would arrive within 5 to 5.5 minutes from Escondido Station 6.

### **5.1.1.1 Emergency Service Level and Capacity**

Using San Diego County fire agencies’ calculated 82 annual calls per 1,000 population, the project’s estimated 1,410 residents (calculated based on 3.12 persons per dwelling; SANDAG 2013), would generate up to 115 calls per year (0.3 calls per day), most of which would be expected to be medical-related calls, consistent with typical emergency call statistics. These estimates are likely overly conservative due to the per capita call factors, which are based on an average of all demographics and sociological populations, including dense, urban areas which,

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on average, result in higher call volumes. A development like Harmony Grove Village South would typically include a demographic that results in fewer calls, per capita, resulting in an overly conservative estimate. Populations associated with Harmony Grove Village and other surrounding neighborhoods would be expected to generate similar per capita call volumes. The station would not be considered a busy station until it averaged a call load of up to 7 to 10 calls per day. The project's contribution of 0.3 calls per day is considered insignificant.

### **5.2 Buildings, Infrastructure and Defensible Space**

The County Consolidated Fire Code and Building Code, in addition to RSFFPD Ordinances should they take jurisdiction, govern the building, infrastructure, and defensible space requirements detailed in this FPP. The project will meet or exceed applicable codes or will provide alternative materials and/or methods acceptable to the fire authority having jurisdiction (secondary access/dead end road length). The following summaries highlight important fire protection features.

Note: all underground utilities, hydrants, water mains, curbs, gutters, and sidewalks will be installed and the drive surface shall be approved prior to combustibles being brought on site. This may be accomplished in a phased manner corresponding to the construction phasing.

Note: Sec. 505.5 of the San DiegoCCFC, Response map updates requires any new development which necessitates updating emergency response maps due to new structures, hydrants, roadways or similar features shall be required to provide map updates in a format compatible with current department mapping services and shall be charged a reasonable fee for updating all response maps. At a minimum, the map updates shall be provided in PDF or a CAD format approved by the FAHJ.

#### **5.2.1 Fire Access**

##### **5.2.1.1 Primary**

The primary project access for HGVS will be via a widened Country Club Drive that provides three travel lanes. This includes a three lane wide bridge constructed over Escondido Creek that also includes separated horse and pedestrian pathways.

##### **5.2.1.2 Secondary/Emergency**

The feasibility of secondary access south, east and west of the project site has been explored, and continues to be explored, with both County staff and RSFFPD. There are two options for secondary access. The first route would be to extend Country Club Drive across Escondido Creek to Harmony Grove Road at a point west of the HGVS Project, where travel can be

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provided in two directions. The second route would require improving a privately owned road that connects with Johnston Road and eventually intersects with Citracado Parkway to the east of the HGVS Project. However, extensive analysis has determined that both of these secondary access routes are infeasible. Due to extremely steep terrain, environmental and biological habitat issues, and privately held property where easements cannot be obtained, there is not a secondary access road solution that can meet the strict definition of the code.

HGVS is effectively an extension of the Harmony Grove Village (HGV), which is located immediately contiguous (west and north) of HGVS and is currently under construction. HGV includes conversion of a large portion of the valley (project area is 500 acres and 742 homes) to low flammability, urban landscapes and forms a fire break for HGVS as well as providing multiple fire safe evacuation routes and potential temporary refuge areas for HGVS residents.

Secondary access to the east or west of HGVS is being explored, but initial analysis indicates that either potential route is constrained by extreme terrain, fuels, significant biological habitat/environmental concerns, and/or unwilling property owners. Because secondary access is likely infeasible, the project's road system technically exceeds the code with regards to dead end road lengths.

Harmony Grove Road and Country Club Drive are both 24 foot wide, two lane roadways. Roads associated with the HGV project to the north will be at least to the same widths. All roads will be paved with an all-weather road surface.

The following recommendations address findings and mitigation for secondary road access for 2014 Consolidated County Fire Code Sections 503.1.2 – Additional Access and 503.1.3 dead-end roads. These findings will meet and exceed the General Plan goals and policies.

### **Findings and Mitigation Conclusion**

The findings and mitigation listed below are considered to provide the fire code official the authority to grant a modification for this project. The basis for the modification is based on the fact that meeting the strict letter of the code for Sections 503.1.2 and 503.1.3, is impracticable. The findings and modifications recommended are in compliance with the intent and purpose of the code. Furthermore, such modification does not lessen health, life, and fire safety requirements.

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## Summary of Findings and Mitigation for this Project

### *Building and Site Design*

The Project, through this FPP, will provide alternative fire protection measures that are site specific and meet the intent of the code, as summarized in the following list:

1. **Availability of Alternative Evacuation Route.** The existing access for 3 to 4 residences crosses the HGVS site (Appendix E). Access for these residences will continue to be provided through the HGVS site after development, but via improved, code conforming roadways. The existing road does not meet the fire code, varying in width, surface, and grade. However, this road is accessible by typical passenger vehicles and does connect with Johnston Road to the east. Therefore, even though the road does not provide code-conforming secondary access, it would be available in an emergency situation that required moving people to the east and the primary access route (Country Club Drive) was not available.
2. **Country Club Drive Designed To Include Three, 12-Foot Travel Lanes.** Country Club Drive would be widened from its intersection with Harmony Grove Road to the southernmost HGVS project entrance to three 12 foot wide travel lanes (Appendix E) which would compensate for lack of secondary access by providing additional capacity for evacuation. The project's traffic engineer states that each lane can effectively handle 1,900 vehicles per hour. There are roughly 60 existing residential units that rely on Country Club Drive as their only means of ingress/egress. With the maximum unit site plan for HGVS, an additional 457 residences would be added. If a conservative estimate of four cars per household is used (the average is likely closer to 2 vehicles), there would be a total of approximately 1,828 vehicles seeking egress, assuming worst case. Therefore, with one lane, all existing and proposed residences could evacuate within one hour and still be approximately 70 vehicles below the capacity. The extra evacuation lane essentially doubles the capacity and provides a significant buffer of 1,972 vehicles per hour over what would otherwise be necessary.

In terms of evaluating how the additional egress lane assists in the movement of people during an emergency, the following analysis provides perspective. It is not uncommon for it to require up to 90 minutes elapsed time from the time the decision is made to evacuate until all evacuees have left their occupancy of origin. Included in this time is dispatch notification to activate Reverse 911, police respond to the area, Reverse 911 calls are completed, and residents gather belongings and leave in their vehicles. If only 1 lane was available for egress at HGVS, it would be anticipated that the evacuation protocol (decision to evacuate, notification to initiate Reverse 911, police respond, and completion of Reverse 911) would take roughly 45 minutes and moving the worst case 1,828 vehicles out of the



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area would require just under one hour, for a total time of 1'45". This time can be reduced significantly with a second lane, as proposed for this project. The evacuation protocol time remains constant at 45 minutes, but the movement of 1,828 vehicles on two lanes cuts the nearly 1 hour to 30 minutes, for a savings of roughly 30 minutes for a complete evacuation when compared to the one lane scenario. Note: As the entitlement process tends to reduce project unit count, this condition should be considered worst case and may be modified resulting in fewer people and reduced timeframes.

3. **Extension of Three Lane Road Into Project.** The three lane road will extend into the project such that no structure is more than 800 feet from the additional lane (Appendix E). This measure provides for wide roadways and is intended to satisfy the fire code requirement of 800 feet maximum dead end road length.
4. **HGVS New Bridge/Crossing.** The existing condition for the estimated 60 residential units that currently rely on Country Club Drive as their only ingress/egress will be improved from a fire safety perspective. The improvements to the existing Arizona Crossing at Escondido Creek will provide year round access where historically, the roadway can be flooded. Also, the project provides a potential temporary refuge if early evacuation is not possible. The new bridge will include the "three-lane capacity," along with barrier separated pedestrian and equine pathways, and from this intersection, provides significant multiple evacuation routes (Appendix E).
5. **HGVS Opticom Signaled Intersection.** Harmony Grove Road and Country Club Drive is a signaled intersection with Opticom traffic control system, which aids response to HGVS by enabling responding fire engines to control the signal for their continuation through the intersection or control the signal during an evacuation event.
6. **HGVS Shelter in Place Philosophy (Not Status).** The project will incorporate the same fire protection philosophies as Rancho Santa Fe's shelter in place communities, but will not seek shelter in place status. HGVS, like most new communities in San Diego County, will offer the last resort option of temporarily seeking refuge on site if early, safe evacuation is not possible.
7. **HGVS Exceeds Chapter 7A Ignition-Resistant Building Standards.** The project will be subject to Chapter 7A ignition resistant building standards and will exceed those requirements in key areas:
  - a. All ventilation for the structures for the development would require ember-resistant vents in addition to 1/8 screening. This exceeds current Building Code requirements.
    - i. Vents for all structures will be ember resistant (Brandguard or O'Hagin)
    - ii. Dryer vents will be ember resistant

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8. **HGVS Community Building: Temporary Refuge/Staging Area.** A community building/club house will be provided that is roughly 5,000 square feet in size (Appendix E). Although not planned as an evacuation center, the building would be available for temporary refuge in the event that wildfire prevented an early evacuation from the site for a portion of the residents or fire agencies needed a staging location. A 5,000 square foot building could temporarily refuge up to 330 people for a short duration. The building would be provided:
- Several large-panel television monitors discreetly located so those that are interested may track newscasts during an emergency event
  - Large computer monitors and capable computers for tracking fire incident status
  - Several computer terminals available for communicating via e-mail
  - Back-up power – battery banks that are “float” maintained and/or supported by solar panels
  - Second utility source or U.L.-rated diesel generator
  - Emergency preparedness kits to make brief stay as comfortable as possible
9. **HGVS Exceeds Fuel Modification Zone Standards.** The structures will be a minimum of 100 feet from wildland fuels. Fuel Modification Zone setbacks exceed the County standard 100 feet that is typically 50 feet irrigated and 50 feet thinned zones. HGVS provides 75 feet of irrigated Zone 1 and a minimum of 25 feet of thinned Zone 2 (Appendix E).
- a. The entire project will include irrigated, Zone 1 Fuel Modification landscaping with no extension or intermingling of naturalized vegetation/fuels within the community.
10. **HGVS Landscape and Building Elements Provided, Not Required.** An important component of the landscape plan that is not currently required by the County Codes is in the area adjacent to stucco building structures’ foundations. A 1 to 3 foot wide landscape free area would be provided to prevent flame impingement under the stucco along the weep screed and help prevent ember penetration into the structure stucco walls.
11. **HGVS Provides Three Separate Egress Points.** The project provides three separate access ways off of Country Club Drive (Appendix E). The first occurs as a paved service road 450 feet south of Harmony Grove Road adjacent to the HGVS waste water land use area. The second is an access into the community approximately 800 feet south of the first access. The third is approximately 400 feet south of the second. These three access ways are part of a looped interior road system so if one or both of the southern roads are blocked, the northern roadway is still accessible by all residents. These three ingress/egress points are in addition to the alternative evacuation route to the east described in item 1 above.
12. **HGVS Road Maintenance Funding Entity Defined.** A funding entity will be established to ensure that the private roads are maintained and available to emergency responders.

## Harmony Grove Village South Fire Protection Plan

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13. **HGVS Annual Fire Operation Contribution.** The project will contribute fair-share funding annually toward fire operations through participation in the County's CSA or RSFFPD's fee schedule. Additional one time funds would be generated in the form of County Fire Fees and/or a developer agreement and would provide funding toward fire operations and safety.
14. **HGVS Automatic- And Mutual-Aid Agreements.** Automatic and mutual aid agreements with neighboring fire agencies would enable truck company response to the site's 3 and 4 story structures, if needed. Escondido's truck company is a calculated 7 minutes 52 seconds from the most remote portion of the project. Automatic aid agreements would need to be negotiated and depending on what agency is operating the new fire station, could require acquisition of a ladder truck if automatic aid cannot be established.
15. **HGV Fire Station Fast Response Travel Time to HGVS.** The planned fire station 1.3 miles to the north of the HGVS can provide response to all HGVS lots (including the most distant) within 2 minutes and 50 seconds. This is well below the General Plan's 5 minute travel time standard.
16. **Fire Flow Exceeds County Requirement.** The Rincon Water District will provide water service for HGVS and requires that new developments must design the water system to deliver two simultaneous 2,500 gpm fire demands in the area of the project. Thus, the water system will be designed to deliver 5,000 gpm during fire demands.
  - a. 2014 San Diego County Fire Code, Section 507.3 Fire Flow – Exceed Code by designing to 5,000 gpm.
17. **HGVS Exceeds Fire Hydrant Code Requirement.** Additional fire hydrants would be placed every 300 feet along project streets. Fire Code requirement is 350 feet to the structure. The additional fire hydrants assist fire operations by reducing operational time to extinguish any fires.
  - a. 2014 Consolidated Fire Code Section 507.5.1.1.1 Hydrant spacing - Exceeds Code Requirements of 350 feet.
18. **HGVS Exceeds Fire Code Requirements: No Gates Or Speed Bumps.** No gates or speed bumps or humps would be allowed in this project. This would allow traffic flow (ingress and/or egress) to move more rapidly in the case of emergency.
  - a. 2014 Consolidated Fire Code Section 503.6 Security Gates – Exceeds code requirements by not allowing gates.
19. **HGVS Provides Signage/Way Finding Plan.** The project will provide a lighted directory at each project entrance to assist with navigation through the community. In addition, street signs will be customized for this project and will meet or exceed lettering size. The goal is to provide clear, easy to follow signage to aid emergency response.

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20. **HGVS Formal Landscape Plan – Fire Authority Review.** A formal landscaping plan would be required for the project and its seven new parcels. Landscaping would be maintained on an ongoing basis. If the area is annexed into RSFFPD, review of the plan would be by Rancho Santa Fe Fire Protection District’s Fire Prevention Specialist/Urban Forester. This would assure that the use of highly flammable species is prohibited and that appropriate plant densities would be maintained. This would also reduce the impact of landscaping hanging into the roadways by reviewing size and location of trees and maintain 13-foot, 6-inch vertical clearance for fire apparatus. If not annexed, then a 3<sup>rd</sup> party fire protection planning firm will provide landscape review to the level RSFFPD would perform.
- a. 2014 Consolidated Fire Code Section 4907.4, Landscape Plans – Rancho Santa Fe has staff to enforce this section of the Fire Code. More restrictive than the current code requirements.
  - b. Annual weed abatement notices will be mailed to all property owners in the Fire District
21. **HGVS Exceeds Monitoring Requirement (No RSF Annex).** If the project is not annexed into RSFFPD, the project will annually hire a Wildland Urban Interface/Fuel Modification Zone qualified inspector to ensure that the entire site landscape (excluding private backyards) is maintained to the County and Fire Agency standards and to the requirements of the project’s FPP. The inspector would provide a letter to the County certifying that the landscape maintenance is compliant.
- a. This exceeds the code as there is no requirement for this level of monitoring.
22. **HGVS Trash Enclosure Exceed Building Code.** All trash enclosures would be located at least 10 feet from any structures.
- a. Trash enclosures are not addressed in the Building Code. More restrictive than the current code requirements.
23. **HGVS Parking Management Plan.** The project has been planned to far exceed the available resident and guest parking standards (Appendix F). The project will include two parking spaces for each residential unit. In addition, the project would be required to include 52 parking spaces for guests. However, the project far exceeds this by providing 434 guest parking spaces, 382 spaces over the required level. Analysis of the parking spaces and their proximity to residences was performed and conforms with SD County Zoning Plan. In addition, a parking management plan will be prepared that requires the project to designate the club house parking area as the valet/shuttle staging area for all homeowners events exceeding 10 guests. Homeowners will need to obtain a parking permit to utilize any of the guest parking overnight. Lastly, a contract with a towing company will be in place so that any vehicle that is illegally parked will be towed within a short timeframe. These efforts are



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designed to maintain the provided roads as unobstructed travel lanes so that emergency response vehicles are not hindered during responses.

24. **HGVS All Risk Emergency Preparedness Plan.** An All Risk Disaster and Emergency Preparedness Working Guide based on the “Ready, Set, Go”! model will be developed for the project covering the following subjects:
- a. Preparing your home – landscaping and home.
  - b. Preparing your communications – 911, contact information, telephone usage, email, radio stations, and useful links using the internet.
  - c. Registering home and cell phones with Reverse 911
  - d. Preparing yourself and family – emergency routes out.
  - e. Preparing for imminent evacuation.
  - f. Preparing your pets and animals.
  - g. Maps showing exit routes.
  - h. Main evacuation routes and public safe zones.
25. **Community Evacuation Planning Coordination with Office of Emergency Services and Law Enforcement Agencies.** The project will work with evacuation coordinators at the San Diego County OES and San Diego Sheriff’s offices. A key to any evacuation of a large number of people is controlling the intersections downstream of the evacuating population. To that end, evacuation routes available to the HGVS project will be identified and prioritized and key intersections mapped and shared with OES and the Sheriff’s office. Integration of this information into pre-planned evacuation scenarios will assist these agencies in mobilizing the necessary number of officers to control these key intersections for movement of HGVS residents during an emergency situation.
26. **Site Implementation Agreement.** If adopted by the County, the developer agrees to implement San Diego County’s (pending) “Site Implementation Agreement” that would ensure the implementation of the above conditions associated with this project (Appendix G).

### 5.2.1.3 Entrances

Gates are not anticipated at the project’s entrances. If gates are proposed elsewhere, all access gates will comply with CFC Section 503.6. Gates on private roads and driveways will comply with County standards for electric gates including an emergency key-operated switch overriding all command functions and opening the gate. Gate setbacks from roadway and other code requirements will be required.

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### **5.2.1.4 Dead Ends**

Roadway cul-de-sacs will comply with the County's minimum 36-foot radius (72-foot diameter) cul-de-sac bulb standard. Where parking is provided within cul-de-sacs, the additional space is provided outside the 72-foot diameter bulb.

### **5.2.1.5 Width and Turning Radius**

All proposed private streets will have a minimum paved width of 24 feet. Where vehicles are allowed to park on one side of the street, the road width is 30 feet. Head-in parking is planned for some project roadways (Private Drives A, I, and J), and include an additional 18 feet of paved area outside the 12 foot travel lanes. Three 12 foot travel lanes are provided along Country Club Drive and Private Drive A to the point of intersection with Private Drives D and E. "No Parking" signs will be installed on one side of the street, once the asphalt is installed and prior to the beginning of construction of any structure. Turning radius for fire apparatus access roads will be 28 feet as measured on the inside edge of the improved width.

Fire Apparatus Access roads at the 4-story structures will include a widened area of 26 feet to allow for truck access and operations.

### **5.2.1.6 Grade**

The maximum grade for new roads and driveways on HGVS will not exceed 20%. Should any sections of road or driveway exceed 15%, they will be will be constructed with Portland Concrete surface and provided heavy broom finish or equivalent surfacing to Fire Department approval. Grades along the Alternative Evacuation Egress may exceed 20%, but are not anticipated to be accessed by fire apparatus.

### **5.2.1.7 Surface**

All fire access and vehicle roadways (excluding the Alternative Evacuation Egress) will be of asphaltic concrete, except as noted above for grades exceeding 15%, and designed and maintained to support the imposed loads of fire apparatus (not less than 75,000 pounds) that may respond, including Type I engines, Type III engines, ladder trucks, and ambulances. Access roads shall be completed and paved prior to issuance of building permits and prior to combustible construction occurring.

### **5.2.1.8 Vertical Clearance**

Minimum unobstructed vertical clearance of 13 feet 6 inches will be maintained for the entire required width for all streets, including driveways that require emergency vehicle access.

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### 5.2.1.9 Identification

Identification of roads and structures will comply with County Fire Code, Section 505.1, as follows:

- Each of the project's three entrances will be provided a map directory and internal signage will be customized to provide clear, intuitive navigation within the Project.
- All structures shall have a permanently posted address, which shall be legible from the street. If it is not legible from the street, an address shall also be posted at street entrance to driveway and shall be visible from both directions of travel.
- Numbers shall be 4 inches high with 0.5-inch stroke.
- Numbers will contrast with background.

### 5.2.2 Water

Water service for the Harmony Grove Village South Project will be provided by Rincon del Diablo MWD and will be consistent with County requirements (Section 507.2/507.3). The water system will be public and metered. The water distribution system is designed to yield a minimum residual pressure of 40 pounds per square inch (psi) during peak hour demands and a minimum residual pressure of 20 psi during maximum day demands plus fire flow. The minimum fire flow requirements for the project will be dual 2,500 gpm at 20 psi, compliant with the requirements of the County and Rincon Water District. Appendix H includes the Project's Facility Availability Letter for Water.

#### 5.2.2.1 Hydrants

Hydrants shall be located along fire access roadways as determined by the SDCFA/RSFFPD Fire Marshal to meet operational needs, at intersections, at the beginning radius of cul-de-sacs, and every 300 feet (on-center) of fire access roadways, exceeding the RSFFPD Code. Hydrants will be consistent with County/RSFFPD Design Standards (507.5.1.1.3).

A three-foot clear space (free of ornamental landscaping and retaining walls) shall be maintained around the circumference of all fire hydrants. Hydrants will be in place and serviceable prior to delivery of combustible materials to the site.

#### 5.2.2.2 Fire Sprinklers

All habitable structures and garages will be provided interior residential fire sprinklers per County Fire Code requirements. Automatic, internal fire sprinklers shall be in accordance with NFPA 13-D Automatic Fire Sprinkler System requirements. Multi-family units will utilize NFPA 13-R sprinkler systems, to code.

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### 5.2.3 Pre-Construction Requirements

Prior to bringing combustible materials onto the site, utilities shall be in place, fire hydrants operational, an approved all-weather roadway in place, and fuel modification zones established and approved. The phasing of these infrastructural components may coincide with project phasing, to the approval of the FAHJ.

### 5.3 Ignition Resistant Construction and Fire Protection Systems

All new structures will be constructed to County Fire Code standards. Each of the proposed buildings will comply with the enhanced ignition-resistant construction standards of the 2013 California Building Code (Chapter 7A). These requirements address roofs, eaves, exterior walls, vents, appendages, windows, and doors and result in hardened structures that have been proven to perform at high levels (resist ignition) during the typically short duration of exposure to burning vegetation from wildfires.

There are two primary concerns for structure ignition: 1) radiant and/or convective heat and 2) burning embers (NFPA 1144 2008, IBHS 2008, and others). Burning embers have been a focus of building code updates for at least the last decade, and new structures in the WUI built to these codes have proven to be very ignition resistant. Likewise, radiant and convective heat impacts on structures have been minimized through the Chapter 7A exterior fire ratings for walls, windows and doors. Additionally, provisions for modified fuel areas separating wildland fuels from structures have reduced the number of fuel-related structure losses. As such, most of the primary components of the layered fire protection system provided the project are required by County of San Diego and state codes but are worth listing because they have been proven effective for minimizing structural vulnerability to wildfire and, with the inclusion of required interior sprinklers (required in the 2010 Building/Fire Code update), of extinguishing interior fires, should embers succeed in entering a structure. Even though these measures are now required by the latest Building and Fire Codes, at one time, they were used as mitigation measures for buildings in WUI areas, because they were known to reduce structure vulnerability to wildfire. These measures performed so well, they were adopted into the code. The following project features are required for new development in WUI areas and form the basis of the system of protection necessary to minimize structural ignitions as well as providing adequate access by emergency responders:

1. Application of Chapter 7A, ignition resistant building requirements
2. Minimum 1-hour rated exterior walls and doors



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3. Multi- pane glazing with a minimum of one tempered pane, fire-resistance rating of not less than 20 minutes when tested according to NFPA 257, or be tested to meet the performance requirements of State Fire Marshal Standard 12-7A-2
4. Ember resistant vents (recommend BrandGuard, O'Hagin or similar ember resistant vents)
5. Automatic, Interior Fire Sprinkler System to code for all habitable dwellings and garages
6. Modern infrastructure, access roads, and water delivery system.

### 5.4 Defensible Space and Vegetation Management

#### 5.4.1 Fuel Modification

A fuel modification zone (FMZ) is an important component of a fire protection system for the project site. Fuel modification zones are designed to gradually reduce fire intensity and flame lengths from advancing fire by strategically placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other on the perimeter of the WUI exposed structures. Because this site will utilize ignition resistant construction building materials, the proposed fuel modification areas are anticipated to provide adequate set back from naturally occurring fuels. The interior of the project will include an irrigated landscape that excludes the intermingling of native fuels. In other words, the entire developed area will be maintained, irrigated landscape that is ignition resistant. The perimeter of the project will include varying FMZ widths. At least 100 feet of fuel modification will be achieved for all lots and will include a minimum of 75 feet of irrigated Zone 1 and a minimum of 25 feet of thinned Zone 2. The adequacy of the provided FMZ widths is based on a variety of analysis criteria including predicted flame length, fire intensity (BTUs) and duration, site topography, extreme weather, position of structures on pads, position of roadways, adjacent fuels, neighboring communities relative to the proposed project, type of construction, and additional fire protection features proposed.

Based on the predicted fire intensity and duration along with flame lengths for this project site and the provided brush management areas, the highest concern is considered to be from firebrands or embers as a principal ignition factor. To that end, this site, based on its location and ember potential, is required to include the latest ignition and ember resistant construction materials and methods for roof assemblies, walls, vents, windows, and appendages, as mandated by San Diego County Fire and Building Codes (Chapter 7A and 2014 Consolidated Fire Code). Ember resistant vents (BrandGuard, O'Hagin, or similar approved vent) will be utilized in all structures.

The individual lot owners will be subject to strict limitations, prohibiting owners from erecting combustible structures, including fences, trellises, arbors, play equipment, etc. as the most

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critical area for structure protection (besides ember protection) is the structure itself and the immediate landscaping area.

### **5.4.1.1 Fuel Modification Zone Requirements**

As one layer of the fire protection system alternative measures for mitigating secondary access/long dead end road length constraints, the project will exceed the 2014 CCFC and 2014 CFC Ordinance #10337 that require that fuel modification zones be provided around every building that is designed primarily for human habitation. Decks, sheds, gazebos, freestanding open-sided shade covers and similar accessory structures less than 250 square feet and 30 feet or more from a dwelling, and fences more than 5 feet from a dwelling, are not considered structures for the establishment of a fuel modification zone. Typically, Zone 1 is a 50 foot wide irrigated, low fuel zone. Zone 2 is a 50 foot wide thinned zone. Fuel modification zones on the HGVS project site will exceed these standards as follows:

1. The entire internal project area including between residential structures and building clusters shall be cleared of vegetation and re-planted with permanently irrigated fire-resistant plants. This results in the exclusion of native fuels within the development area and minimizes the likelihood of ignitions internal to the project.
2. Perimeter lots will include at least 100 feet of FMZ with an extended Zone 1 (from 50 feet to 75 feet) and a minimum of 25 feet of thinned Zone 2.
3. The County/RSFFPD may provide lists of prohibited and recommended plants. This FPP includes a proposed list of suggested plants for FMZs (Appendix I) and prohibited plants (Appendix J).
4. The fuel modification zone will be located entirely on the HGVS property.
5. To ensure long-term identification and maintenance, permanent markers will be installed to identify the fuel modification zones on the perimeter of the developed areas.

### **Roadway Fuel Modification Zones**

Roadway fuel modification is addressed in San Diego County Fire Code (Section 4907.2.1 - Fuel Modification of Combustible Vegetation from Sides of Roadways). SDCFA's Fire Marshal may require a property owner to modify combustible vegetation in the area within 20 feet from each side of the driveway or a public or private road adjacent to their property to establish a fuel modification zone.

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## Special Fuel Management Issues

Trees may be planted within FMZs as long as they conform to Section 4907.3. Trees of the County Fire Code. On the Project site, tree planting in the fuel modification zones and along roadways is acceptable, as long as they meet the following restrictions as described below and in the Vegetation Management Section:

- For streetscape plantings, fire resistive trees can be planted within provided parkways. Care should be given to the type of tree selected, that it will not encroach into the roadway, or produce a closed canopy effect.
- Crowns of trees located within defensible space shall maintain a minimum horizontal clearance of 10 feet for fire resistant trees. Mature trees shall be pruned to remove limbs one-third the height or 6 feet, whichever is less, above the ground surface adjacent to the trees.
- Dead wood and litter shall be regularly removed from trees.
- Ornamental trees shall be limited to groupings of 2–3 trees with canopies for each grouping separated horizontally as described in Table 7 (Table 4907.3.1 from County Fire Code).

**Table 7**  
**Distance Between Tree Canopies by Percent Slope**

Percent of Slope	Required Distances Between Edge of Mature Tree Canopies <sup>(1)</sup>
0–20	10 feet
21–40	20 feet
41+	30 feet

<sup>1</sup> Determined from canopy dimensions as described in Sunset Western Garden Book (Current Edition)

## Specific Landscaping Requirements

The following requirements are provided for HOA-maintained fuel modification zones and individual homeowner yards. Each zone would include permanent field markers at the property line to delineate the zones, aiding ongoing maintenance activities that will occur on site. All landscaping shall be maintained by the homeowner and/or Harmony Grove Village South HOA.

Plants used in the fuel modification areas or landscapes will include drought-tolerant, fire resistive trees, shrubs, and groundcovers. The plantings will be consistent with County of San Diego's Suggested Plant List for Defensible Space (Appendix D). The intent of the list is to provide examples of plants that are less prone to ignite or spread flames to other vegetation and combustible structures during a wildfire. Additional Plants can be added to the landscape plant material palette with the approval from the County of San Diego.

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Landscape plans shall be in accordance with the following criteria:

1. All fire resistive tree species shall be planted and maintained at a minimum of 10 feet from the tree's drip line to any combustible structure. Non-fire resistive trees (including conifers, pepper trees, eucalyptus, cypress, and palms (*Washingtonia* and *Phoenix* species)), shall not be allowed on site. A list of acceptable trees can be found in Appendix I.
2. Limit planting of large unbroken masses especially trees and large shrubs. Groups should be 2–3 trees maximum, with mature foliage of any group separated horizontally by at least 10 feet, if planted on less than 20% slope, and 20 feet, if planted on greater than 20% slope. If shrubs are located underneath a tree's drip line, the lowest branch should be at least three times as high as the understory shrubs or 10 feet, whichever is greater.
3. All tree branches shall be removed within 10 feet of a fireplace chimney or outdoor barbecue.
4. Non-combustible surface (pavement, concrete, decomposed granite, etc.) shall be provided for pathways around structures for fire fighter access to side yards and backyards.
5. Combustible mulches and wood chips must be 12 inches away from any side of a combustible structure with weep screeds.
6. Irrigated wet zone (water conserving irrigation systems with efficient drip emitters and “smart” controllers and use of California Friendly landscape concepts)
7. No tree limb encroachment within 10 feet of a structure or chimney, including outdoor fireplaces.
8. Tree maintenance includes limbing-up (canopy raising) 6 feet or one-third the height of the tree, whichever is greater, and removal of dead foliage and branches.

### Pre-Construction Requirements

- Perimeter fuel modification areas must be implemented prior to commencement of construction utilizing combustible materials.
- Existing flammable vegetation shall be reduced by 60% on vacant lots upon commencement of construction.
- Dead fuel, ladder fuel (fuel which can spread fire from ground to trees), and downed fuel shall be removed and trees/shrubs shall be properly limbed, pruned, and spaced per this plan.
- The remainder of the FMZs required for the particular lot shall be installed and maintained prior to combustible materials being brought onto any lot under construction.



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### **Environmentally Sensitive Areas/Riparian Areas**

Fuel modification in environmentally sensitive areas, if any are encountered, will require approval from the County and the appropriate resource agencies (California Department of Fish and Game and U.S. Fish and Wildlife Service) prior to any vegetation management activities occurring within those areas.

### **Prohibited Plants**

Certain plants are considered to be undesirable in the landscape due to characteristics that make them highly flammable. These characteristics can be physical or chemical.

The plants included in the Prohibited Plant List (Appendix J) are unacceptable from a fire safety standpoint, and shall not be planted on the site unless otherwise approved by the RSFFPD.

### **Vegetation Management Compliance Schedule**

All fuel modification area vegetation management shall be completed annually by June of each year and more often as needed for fire safety, as determined by SDFCA. If the project is being provided fire protection by SDCFA, the HOA shall annually hire a 3<sup>rd</sup> party, qualified FMZ inspector to certify that maintenance has been completed to the intent of this FPP. The HGVS HOA shall be responsible for all vegetation management throughout the common areas of the project site, in compliance with the requirements detailed herein and SDCFA requirements. The Harmony Grove Village South HOA shall be responsible for ensuring long-term funding and ongoing compliance with all provisions of this FPP, including vegetation planting, fuel modification, vegetation management, and maintenance requirements throughout the private portions of the project site.

### 6 CUMULATIVE IMPACT ANALYSIS

Cumulative impacts from multiple projects can cause fire response service decline and must be analyzed for each project. The HGVS and its proposed maximum 457 residential units and approximately 1,400 residents represent minimal anticipated increases in fire and emergency medical response needs. However, when considered cumulatively with other projects planned in the jurisdictional area, the cumulative impact is considered potentially significant.

Despite the generally low increase in the anticipated number of calls per year from the HGVS site, the project contributes to the cumulative impact on fire services, when considered with other anticipated projects within the primary response area. Without additional resources over time, the cumulative impact may result in a situation where the response capabilities erode and service levels decline. The project's contributions to fire resources through building fees and ongoing fair share allocations, along with state fire fees, combined with the same contributions from future development in the area are expected to result in funding that can be used for enhancing response capabilities and at least maintaining the current standards for firefighting and emergency response, if not improving them in this area of the County where there is a known gap. The approved fire station that will be built in Harmony Grove Village requires additional funding to cover annual operating costs. The HGVS project will provide fair-share funding which will help close the financial gap that currently exists. Over the long term, it is anticipated that fire response in the area will be improved from its current status and SDCFA or RSFFPD will be able to perform its mission into the future at levels consistent with the County Consolidated Fire Code and the San Diego County General Plan.

The requirements described in this FPP, including ignition-resistive construction, additional fire protection systems, and fuel modification/vegetation management, are designed to aid firefighting personnel such that HGVS residents and structures are protected and impacts to the fire response system are minimal. Based on the type of wildfire anticipated/modeled for this area and the corresponding fire protection project features, including conformance with building and fire codes, provisions for alternative ingress/egress, ongoing maintenance of roads, infrastructure, vegetation management and defensible space results in a potentially significant, but mitigated cumulative impact.

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### 7 CONCLUSION

This FPP is being submitted with a specific request for an exception to the code standard for dead-end road requirements and secondary access.

This FPP supports an application for project entitlement of the HGVS development project. It is submitted in compliance with requirements of the County's (and RSFFPD's) condition for FPP content. The requirements in this document meet fire safety, building design elements, fuel management/modification, and landscaping recommendations of the applicable codes. Where the project does not strictly comply with the Code, specifically with secondary access/dead end road length, alternative materials and methods have been proposed that provide functional equivalency as the code intent, as detailed in Section 5.

Fire and Building Codes and other local, county, and state regulations in effect at the time of each building permit application supersede these recommendations unless the FPP recommendation is more restrictive.

The recommendations provided in this FPP have been designed specifically for the proposed construction of structures adjacent the WUI zone at the HGVS project site. The project site's fire protection system includes a redundant layering of protection methods that have been shown through post-fire damage assessments to reduce risk of structural ignition and provide for at least equivalent emergency evacuation capabilities. Modern infrastructure will be provided along with implementation of the latest ignition resistant construction methods and materials. Further, all structures are required to include interior, automatic fire sprinklers consistent with CFC and CBC.

Fuel modification will occur throughout the project site, both internally and on exposed edges of the developed areas. The fuel modification zone will be maintained and inspected annually by the HGVS HOA, through a qualified 3<sup>rd</sup> party inspector. Maintenance includes removing all dead and dying materials and maintaining appropriate horizontal and vertical spacing. In addition, plants that establish or are introduced to the fuel modification zone that are not on the approved plant list will be removed.

Ultimately, it is the intent of this FPP to guide, through code and other project specific requirements, the construction of structures that are defensible from wildfire and, in turn, do not represent significant threat of ignition source for the adjacent native habitat. It must be noted that during extreme fire conditions, there are no guarantees that a given structure will not burn. Precautions and mitigating actions identified in this report are designed to reduce the likelihood that fire would impinge upon the proposed structures. There are no guarantees that fire will not occur in the area or that fire will not damage property or cause harm to persons or



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their property. Implementation of the required enhanced construction features provided by the applicable codes and the mitigating secondary access requirements provided in this FPP will accomplish the goal of this FPP to assist firefighters in their efforts to defend these structures, move people to areas away from emergency situations, and reduce the risk associated with this project's WUI location. For maximum benefit, the developer, contractors, engineers, and architects are responsible for proper implementation of the concepts and requirements set forth in this report. Homeowners are responsible to maintain their structures and lots as required by this report and applicable Fire and building Codes.

This FPP recommends that the homeowners or other occupants who may reside within the HGVS neighborhoods adopt a conservative approach to fire safety. This approach must include maintaining the landscape and structural components according to the appropriate standards and embracing a “Ready, Set, Go<sup>2</sup>” stance on evacuation. Accordingly, occupants should evacuate the residence and the area as soon as they receive notice to evacuate, or sooner, if they feel threatened by wildfire or structure fire in a nearby residence. Fire is a dynamic and somewhat unpredictable occurrence and it is important for residents to educate themselves on practices that will improve their home survivability and their personal safety.

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<sup>2</sup> International Fire Chiefs Association “Ready, Set, Go” website link: <http://wildlandfirersg.org/>

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## Harmony Grove Village South Fire Protection Plan

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## Harmony Grove Village South Fire Protection Plan

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## Harmony Grove Village South Fire Protection Plan

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### 9 LIST OF PREPARERS

#### **Project Manager/Lead Fire Protection Planner:**

Michael Huff

Fire Protection Planner; San Diego County California Environmental Quality Act Consultant List  
Dudek

#### **FPP Preparation:**

Sid Morel

Fire Protection Planner  
Dudek

#### **FPP Preparation and Fire Behavior Modeling:**

Michael Scott

Urban Forester/Fire Protection Planner  
Dudek

## Harmony Grove Village South Fire Protection Plan

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# EXHIBIT 8

# MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN

SAN DIEGO COUNTY, CALIFORNIA



August 2010





**4.3.7 Structure/Wildfire Fire****4.3.7.1 Nature of Hazard**

A structural fire hazard is one where there is a risk of a fire starting in an urban setting and spreading uncontrollably from one building to another across several city blocks, or within hi-rise buildings.

A wildfire is an uncontrolled fire spreading through vegetative fuels and exposing or possibly consuming structures. They often begin unnoticed and spread quickly. Naturally occurring and non-native species of grasses, brush, and trees fuel wildfires. A wildland fire is a wildfire in an area in which development is essentially nonexistent, except for roads, railroads, power lines and similar facilities. An Urban-Wildland/Urban Interface fire is a wildfire in a geographical area where structures and other human development meet or intermingle with wildland or vegetative fuels. Significant development in San Diego County is located along canyon ridges at the wildland/urban interface. Areas that have experienced prolonged droughts or are excessively dry are at risk of wildfires.

People start more than 80 percent of wildfires, usually as debris burns, arson, or carelessness. Lightning strikes are the next leading cause of wildfires. Wildfire behavior is based on three primary factors: fuel, topography, and weather. The type, and amount of fuel, as well as its burning qualities and level of moisture affect wildfire potential and behavior. The continuity of fuels, expressed in both horizontal and vertical components is also a determinant of wildfire potential and behavior. Topography is important because it affects the movement of air (and thus the fire) over the ground surface. The slope and shape of terrain can change the speed at which the fire travels, and the ability of firefighters to reach and extinguish the fire. Weather affects the probability of wildfire and has a significant effect on its behavior. Temperature, humidity and wind (both short and long term) affect the severity and duration of wildfires.

San Diego County's topography consists of a semi-arid coastal plain and rolling highlands, which, when fueled by shrub overgrowth, occasional Santa Ana winds and high temperatures, creates an ever-present threat of wildland fire. Extreme weather conditions such as high temperature, low humidity, and/or winds of extraordinary force may cause an ordinary fire to expand into one of massive proportions.

Large fires would have several indirect effects beyond those that a smaller, more localized fire would create. These may include air quality and health issues, road closures, business closures, and others that increase the potential losses that can occur from this hazard. Modeling for a larger type of fire would be difficult, but the consequences of the most recent San Diego fires (Firestorm of October 2003) should be used as a guide for fire planning and mitigation.

**4.3.7.2 Disaster History**

Table 4.3-3 lists the most recent major wildfires in San Diego County. Wildland fires prompted five (5) Proclaimed States of Emergency, and Urban/Intermix Fires prompted three (3) Proclaimed States of Emergency in the County of San Diego in the period 1950-2007. In October of 2003 the second-worse wild-land fire in the history of San Diego County destroyed 332,766

**5.21.2.2 Objectives and Actions**

The County of San Diego developed the following broad list of objectives and actions to assist in the implementation of each of their 11 identified goals. The County of San Diego developed objectives to assist in achieving their hazard mitigation goals. For each of these objectives, specific actions were developed that would assist in their implementation. A discussion of the prioritization and implementation of the action items is provided in Section 5.21.2.3.

<b>Goal 1: Promote disaster-resistant future development.</b>	
<i>Objective 1.A: Facilitate the development or updating of general plans and zoning ordinances to limit development in hazard areas.</i>	
Action 1.A.1	Update General Plan every 10 years.
Action 1.A.2	Attract and retain qualified, professional and experienced staff.
Action 1.A.3	Continue to identify high hazard areas using GIS.
<i>Objective 1.B: Facilitate the adoption of building codes that protect existing assets and restrict new development in hazard areas.</i>	
Action 1.B.1	Review Codes every 3 years.
<i>Objective 1.C: Facilitate consistent enforcement of general plans, zoning ordinances, and building codes.</i>	
Action 1.C.1	Staff enforcement personnel to a level to ensure compliance.
Action 1.C.2	Develop and coordinate permits for all agencies.
Action 1.C.3	Continue to utilize multi-agency permitting and enforcement team.
<i>Objective 1.D: Limit future development in hazardous areas</i>	
Action 1.D.1	Development should be in harmony with existing topography.
Action 1.D.2	Development patterns should respect environmental characteristics.
Action 1.D.3	Clustering should be encouraged.
Action 1.D.4	Development should be limited in areas of known geologic hazards.
Action 1.D.5	Development in floodplains shall be limited to protect lives and property.
Action 1.D.6	High fire hazard areas shall have adequate access for emergency vehicles.



**2010 Board Members:**

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

20223 Elfin Forest Rd., Elfin Forest, CA 92029

January 25, 2011

Honorable Chairwoman Pam Slater-Price  
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 Chairwoman Slater-Price:

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

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 8<sup>th</sup>, 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”.

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 40 total units. The proposed Staff Recommended Map designation is very close to the current entitlements and would reduce the project density to approximately 25 to 30 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 about 40 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 **325% increase 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), and no public access at all during flooding of the Escondido Creek, a reliable yearly occurrence. These are some of the reasons the project was heading for denial prior to being abandoned, 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/1mscp\\_sh.jpg](http://www.sangis.org/LibraryService/DownloadedFiles/1mscp_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 (personal conversation with 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.

*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.

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 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. There has been no attempt by any representatives of the Preferred Bank project to meet with the Elfin Forest Harmony Grove Town Council, or with the Harmony Grove Meadows subcommittee. It is apparent from Mr. Shaw's insistence that his project is similar to the HG Village project that his client is not familiar with the planning model adopted for the Harmony Grove area nor with the unique history of the Harmony Grove Village project. If they are truly interested in designing the "most desirable project," we suggest that they meet with the Elfin Forest Harmony Grove Town Council to discuss the issues concerning this historic rural area.

Thank you for the opportunity to comment,

A handwritten signature in black ink, appearing to read "Melanie Fallon". The signature is fluid and cursive, with a small flourish at the end.

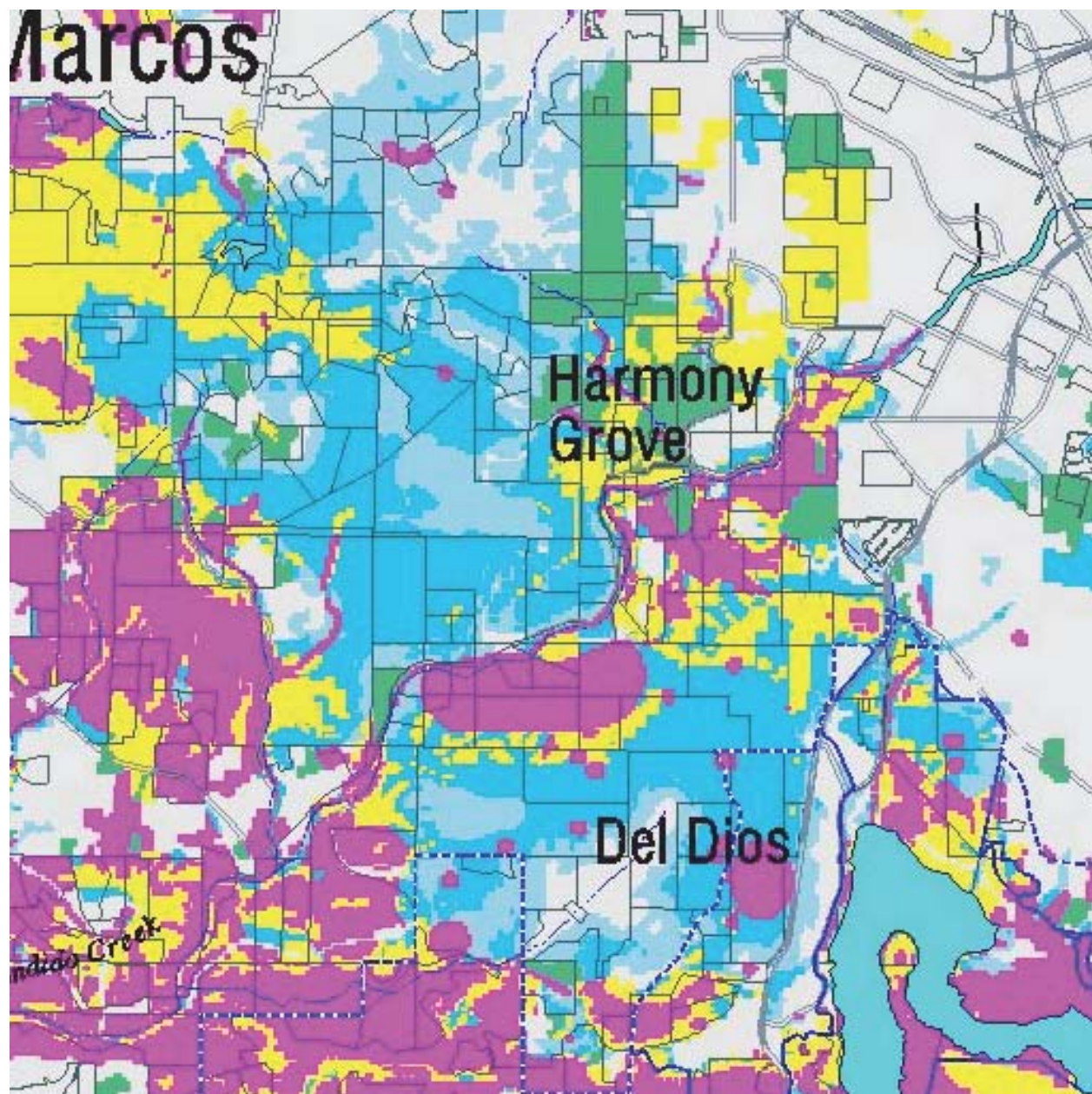
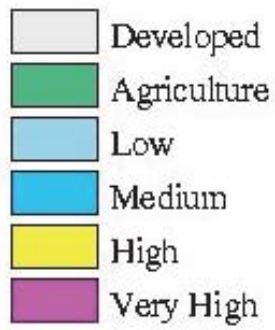
Melanie Fallon

Chair, Elfin Forest Harmony Grove Town Council

Attachments

Cc: County Supervisors  
Devon Muto

# Legend





[http://www.nctimes.com/news/local/article\\_624882ef-f274-5429-9698-2955f3dc75b6.html](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](mailto:qeastman@nctimes.com).



September 28, 2015

Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

The mission of The Escondido Creek Conservancy (TECC) is to preserve and restore the Escondido Creek watershed. Our vision is that the watershed, which extends from Bear Valley and Lake Wohlford to the San Elijo Lagoon and includes most of the city of Escondido, will become a model of vibrant urban communities and viable natural ecosystems thriving together. To accomplish this requires sound planning and development, sensitive to, and appreciative of, our natural resources. Unfortunately the Harmony Grove Village South (HGVS) project fails this test.

TECC does not dispute the need for more housing. We support, in general, the current County General Plan especially those aspects that came together as a result of many years of careful discussions and are supported by thoughtful studies and community consensus. Unfortunately, the HGVS was subject to a last-minute owner-initiated up zone request (SD-7, post BOS approval of the GP) that undermined the \$18 million and decade-long process to update the general plan (See attached letter from the Elfin Forest Harmony Grove Town Council). TECC opposes the HGVS project as it will produce tremendous negative impacts in our communities and diminish our quality of life, natural habitats and transportation systems, while increasing the cost of public services and the risk of fire.

### **Biology and Open Space Habitat Preservation**

Residents adjacent to the HGVS property regularly observe significant wildlife foraging on and near this property, including deer, bobcats, coyotes, numerous raptors (golden eagles, red tail and cooper hawks), California gnatcatchers, western red diamond rattlesnakes, and horned lizards on the project site. There is the possibility that

**The Escondido Creek Conservancy (TECC)** is a non-profit, public benefit corporation whose mission is to protect and restore the Escondido Creek watershed.



Stephens kangaroo rats inhabit the property as well, based on MSCP habitat modeling and observations by local residents of possible SKR dens.

While we often think that preservation is about protecting threatened and endangered species, we must recognize that keeping common species common is one of the keys to protecting complete ecosystems and preserving threatened and endangered species.

At least \$60 million, largely public funding, has been spent in the past decade to purchase and preserve habitat lands in the areas near HGVS in the “gnatcatcher core” of the north county multiple species conservation plan. As included in the original staff recommendation to the updated general plan, the HGVS site would have supported approximately 25 homes. That number, developed as a result of a thoughtful and fair process to update the general plan, could result in a development sensitive to the site and designed in a manner compatible with protecting the major investment that taxpayers have previously made in the area to preserve and protect habitat lands.

Now, instead of the number that the professional planning staff had recommended, the current proposal to site 453 homes adjacent to sensitive open space will create numerous severe detrimental impacts to preserved lands and will forever alter community character in Harmony Grove and Elfin Forest. By allowing this development to move forward, the County will undermine the previous \$60 million investment as preserved lands, including investments by County Parks and Recreation, will become more expensive to manage.

This project shares borders with four parcels of preserved open space, including land owned by TECC, and is contiguous with more than 1,600 acres of preserved land. The impacts of this project on these lands must be addressed in the Draft EIR, including:

1. **Introduction of invasive exotic species**, both plants and animals, inadvertently carried to adjacent preserved lands from bikes, people, animals or spread from backyards or fuel modification zones adjacent to nearby preserved lands. *How will this be addressed in the Draft EIR?*
2. **Companion animals** (pets) which can act as predators of and competitors with native wildlife, as well as vectors for disease. *How will the impacts of free ranging domestic animals be addressed in the Draft EIR?*
3. **Use and creation of undesignated trails** associated with new residents can significantly degrade the natural environment. *How will the impacts of undesignated trails be addressed in the Draft EIR?*



**4. Influence on earth systems**, such as solar radiation, soil richness and erosion, wind damage, hydrologic cycle, and water pollution, can affect the natural environment. *How will the Draft EIR address these impacts?*

**5. Loss of foraging habitat.** Wildlife predators, especially raptors, utilize open areas, and especially the non-native/native grasslands on the property and old agricultural fields for foraging. *How will the Draft EIR propose to mitigate these impacts?*

**6. Impacts to local and regional wildlife movement and health.** As urban residents move in, they bring with them urban habitats that increase noise and lighting, both of which are known to negatively affect wildlife. Additionally, it is unfortunately common in urban areas to place poison bait stations around developments to control rats and vermin. Studies show that this poison bio-accumulates in wildlife and could be adding to the instability of wildlife populations and affecting more directly certain species like bobcats. *How will the Draft EIR propose to mitigate the impacts to local and regional wildlife movement and health?*

**7. Increased land management costs.** The siting of dense, urban housing so near protected habitat will affect the level and intensity of management costs for not only TECC, but for County Parks and Recreation, the Center for Natural Lands Management and the Olivenhain Municipal Water District, all of which are local land/open space managers with significant habitat monitoring and protection responsibilities. *How will off-site impacts be addressed in the Draft EIR? Will local agencies and NGO's with land management responsibilities be compensated by the applicant for costs associated with increased management and maintenance of preserved lands? The impact and increased costs to these nearby conservation lands should be studied in the Draft EIR.*

**8. Ineffective open space onsite.** The open space areas proposed on the project site are too narrow, fragmented, and too close to the development. While they might be nice green space for the residents, as designed, they would not function as viable wildlife habitat and should not be counted as such. Alternative designs should be studied, using the County staff original updated general plan recommended zoning of Sr-2, SR-4, and RL 20, to determine the best layout to allow some development while preserving and restoring more viable habitat, conserving existing critical habitat, minimizing edge effects and enhancing and restoring a riparian area that runs from the southeast portion of the property to western edge of the property at Country Club Drive. *How will this be addressed in the Draft EIR?*

## **Visual Impacts**

From the perspective of CEQA, the term "aesthetics" pertains to the perceived visual quality of an area characterized by one or more visual elements such as an open space,



scenic view, or architecture. Aesthetically significant features can occur in a diverse array of environments, ranging from urban centers to rural agricultural lands to natural woodlands. A project can have significant impacts on visual quality if it negatively affects the aesthetically significant features by altering them in part or wholly, e.g., by destroying vegetation integral to a scenic vista, or by constructing a building in an architectural style that conflicts with the existing setting.

While the developer has posited that somehow the currently under construction Harmony Grove Village project and the proposed Harmony Grove Village South project are in the same area, that HGVS is visually contiguous with HGV, and that HGVS is a simple continuation of HGV, it's important to visit the site to understand the visual context.

The HGVS is separated from HGV by several geographic and geologic features, the most obvious being the Escondido Creek. A visitor to the HGVS today will see construction activity on Harmony Grove Road associated with the HGV development but they would also see a dramatic slope of approximately 60 feet rising from Harmony Grove Road that is currently being lushly landscaped by the HGV developer with native and other trees and plants. Currently no homes or buildings from the HGV site are visible from the valley below. Even with the buildout of HGV, no HGV homes will be visible from the valley. As the landscape matures, it is likely that no buildings of any kind from HGV will be visible from the valley. As planned and now constructed, HGV creates that visual boundary between urban and rural, the urban limit line which was the result of good planning and community consensus referenced in the attached letter.

Unfortunately, rather than being an extension of HGV as the developer has suggested, HGVS, seemingly dropped from the sky, is a dense urban project in a rural and semi-rural area and as such will dramatically negatively affect the aesthetics of the valley. If this project had been proposed along the Escondido Creek Trail within urban Escondido, TECC would most likely be first in line to recommend it be constructed. As designed, it will change the visual character of Harmony Grove irreversibly. It belongs in an urban setting-not in Harmony Grove.

It's important to note that the density of HGVS is significantly higher than the most dense portion of HGV. The densest center of HGV is approximately 8-9 dwelling units per acre of single family residences (5,000 sq ft lots). HGVS proposes densities of 12-13 units per acre, the majority of which are multi-family units. The fact that the applicant is having difficulty locating secondary ingress/egress is evidence in itself that this site is isolated in nature, in spite of the perception that it is "near" infrastructure and amenities. *The impacts to aesthetics associated with the HGVS project could be dramatic and unmitigatable and must be addressed in the DEIR.*



## Fire Protection

Wildland fire is a natural event in chaparral. However, the frequency and intensity of fires in San Diego County has increased well beyond the natural cycle due to human activity. Harmony Grove is currently a semi-rural valley with one primary way in and one primary way out. Because of the history of fires in the area, current residents understand they live in a high-fire risk area but also appreciate and respect the rural community and adjacency to preserved lands.

Yet, the applicant is requesting a waiver of secondary ingress/egress standards for this project which, if approved, would have the effect of creating a "shelter in place" community for not only the project, but all existing residences in the valley as even with the current residences in the valley, evacuation can be a difficult. This was clearly demonstrated during the Cocos fire in May of 2014. Evacuation from Elfin Forest and San Elijo Hills communities was made impossible due to grid locked parkways in the San Elijo Hills development. Only a sudden shift in the fire direction saved many residents from being caught in an inferno in their vehicles. Harmony Grove is even more constrained than Elfin Forest and San Elijo Hills from an evacuation standpoint. *The Draft EIR should study the feasibility of the applicant building a project to "shelter in place" standards and bringing all existing structures/residents in the valley up to shelter in place standards at the applicant's cost. Additional consideration must also be given for small and large animal "shelter in place" accommodations, also at the applicant's cost.*

TECC's concern as a land manager is the addition of dense urban-style developments like HGVS in rural and semi-rural areas most likely will result in residents who expect urban-style amenities, services and a more urban lifestyle. Sadly, urban life and wildlife are not compatible. Urban residents, for example, often have a fear of the chaparral and other natural flora and see it as a detriment to their homes. New residents begin to advocate for additional brush clearing to protect their homes from fire. In this view, natural habitat is seen more as fuel than a community asset. Those urban demands will undermine the public investment made in open space preservation as otherwise healthy habitat land must be thinned to provide fire breaks to new homes. Obviously if fewer homes were constructed, it would be easier to evacuate those homes in case of fire and easier to prevent and manage fires in the area. *How will these issues be addressed in the DEIR?*



## Circulation Plan

There has been discussion in the community, most recently before the San Dieguito Planning Group on 9/24/15, about the applicant's efforts to secure secondary access for the project. We have heard references to potential secondary access from the site out to Johnston Road and/or to Del Dios Highway. If the applicant is assuming they can secure secondary access across the nearby TECC-owned property to Johnston Road, the DEIR must consider alternatives as TECC will not provide such access. Additionally, TECC would oppose secondary access to Del Dios Highway as the environmental impacts would be devastating. *If these are in fact the routes that the applicant is reviewing, the DEIR must fully examine alternatives to these choices.*

## Air Quality

In spite of the project being represented as "near" existing infrastructure, it will function as a motor vehicle dependent community, thereby contributing to increased GHG and violating AB 32 as well as executive orders regarding emissions issued by governors Brown and Schwarzenegger. This contributes to faster and more dramatic climate change, which alters the habitat on preserved lands. Further the courts have ruled the County's carbon reduction plan as insufficient to meet stated goals. How communities are planned, and most critically, sited, relate directly to use and development of efficient transportation. *How will the DEIR address compliance with AB 32, and other GHG regulations?*

If the project were built to the County Planning staff's original recommended general plan density, all the issues mentioned above could be ameliorated as a project could be designed which was sensitive to the landscape and nearby preserved lands.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Barnard', with a stylized flourish at the end.

Kevin Barnard  
President

Attachment

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

The San Dieguito Planning Group appreciates the opportunity to comment on the Notice of preparation of an Environmental Impact Report for the project referenced above.

**Project Description:** The significance of the project placement in the rural periphery buffer of the existing Community Development Model is a significant land use impact that should be studied. The overall density of the CDM was calculated to support the commercial area yet balance the number of rural and urban homes in the entire community to preserve the rural political voice; this background information should be disclosed and analyzed in the NOP as the baseline perspective from which to accurately judge project impacts. In addition, all remedies for impact on rural lifestyle proposed by the applicant should be supported by evidence-based research, as the future existence of this historic community is at stake and once destroyed, cannot be replaced. The impact of the potential breach of trust of the agreed overall planning scheme for the valley should be studied, not just for this area, but for every planning area in the County.

**Land Use and Planning: LU 1.4 vs LU 1.2:** The impact of the determination that the project represents an expansion of an existing village under LU 1.4 should be further evaluated. If the County determines that the meaning in LU 1.4 of “only where contiguous” can be loosened to include “near,” all occurrences of the word “contiguous” in the GP are subject to reevaluation with this new meaning of “near,” and the financial and planning impacts of this decision must be evaluated County wide. If LU 1.4 does not apply, then the project should be evaluated for consistency with LU 1.2, which prohibits leapfrog development with village densities outside of established village or sewer service boundaries. The growth-inducing potential of this high density GPA in Harmony Grove should be evaluated.

The sales market for homes is being challenged by the Harmony Grove Village. Adding additional homes, both single family dwellings and multi-family units, might not meet the projections of the owners open the use to apartment dwelling. The impacts to the community for this non-owner occupied resident should be investigated and studied.

**Public Safety And Services:** The 453-unit project as currently proposed has only two exits that both lead to Country Club Drive with no intervening intersections, hence they function as one exit. The high number of cul de sacs with limited overall egress points featured in the project design would also be problematic in case of emergency evacuation. The EIR needs to fully analyze evacuation scenarios at full build out of HGV, Valiano, and HGVS - including existing residents and their large animal livestock - with the most recent fire behavior data available, including the 2014 Coco’s fire.

The potential for fatal entrapment of persons and privately owned animals on these rural roads (horse trailer rear exit ramps cannot be lowered if there are cars behind) and even on nearby local

highways should be studied as part of this project EIR. Experience with the Katrina disaster has shown that people do not want to leave pet animals behind during evacuations, and therefore the analysis for rural residents, who often have many large animals, should be specially designed to assess this greater risk.

The impact on Federal and State disaster funding of allowing an exception for the County's Secondary Egress Standards should be studied. Because of the potential for extreme safety hazards and liability to the County, any request for waivers of fire safety-related regulations in this high fire danger area should be supported by evidence-based research proving that granting these waivers has not been demonstrated in case studies of similar rural communities at similar fire risk levels to decrease public safety. If no such case studies exist, the County should perform a cost-benefit analysis, including the likelihood of being sued by existing residents and community organizations, to determine the prudence of becoming the initial case.

The project proposes to use a waste water treatment plant where only septic systems are allowed by the HG CP. The possible cumulative adverse effects on property values of adding a second such facility within sight of the Village treatment plant and thus burdening existing residents who all use septic fields to the odors and impacts of two nearby sewage treatment plants that will provide no possible benefit to them should be studied.

**Recreation:** The impact on the community's only public park in Harmony Grove Village of the dramatic increase to 453 neighboring homes should be studied and mitigated.

**Transportation and Traffic:** Country Club Drive and Kauana Loa Drive, both non Mobility Element roads, are at risk of being added back to the Mobility Element Plan due to the added project traffic and impacts of this change on the rural road network should be studied. The added stress of the increased density on the areas' private roads and the financial impact on local residents responsible for maintaining those private roads should be studied and mitigated. The EIR should also study the incremental and specific impact of the project on the construction of long-planned infrastructure like a bridge over the Escondido Creek.

**Agriculture and Forestry Resources:** Because the HG CP calls for encouraging family owned farms, the impact of removal of these land uses from the project site should be studied.

**Project Alternatives:** We request that one of the alternatives analyzed be a project feasible in accordance with the HG CP at the original density of the Community Development Model agreed upon by the community and the County (~25 units); that is, 2-acre minimum size lots on septic systems with no sewage treatment plant, and without the need for a GPA, to avoid the mandatory findings of significance. We also wish to propose a project objective: "Provide a development design that will be seen as an improvement to the existing land use plan by a majority of the local residents as well as members of the greater County area."

For the remainder of the resources studied, we are in agreement with the County's assessment of potentially significant impacts.

Thank you for the opportunity to comment.



## **SAN LUIS REY BAND OF MISSION INDIANS**

***1889 Sunset Drive • Vista, California 92081***

***760-724-8505 • FAX 760-724-2172***

***www.slrmissionindians.org***

September 25, 2015

Peter Eichar  
Project Manager  
Planning & Development Services  
County of San Diego  
5510 Overland Ave., Ste. 110  
San Diego, CA 92123

**VIA ELECTRONIC MAIL**  
**Peter.Eichar@sdcounty.ca.gov**

**RE: TRIBAL RESPONSE REGARDING THE NOTICE OF PREPARATION  
OF AN ENVIRONMENTAL IMPACT REPORT FOR THE HARMONY  
GROVE VILLAGE SOUTH GENERAL PLAN AMENDMENT, SPECIFIC  
PLAN, REZONE, TENTATIVE MAP, AND MAJOR USE PERMIT  
PROJECT (PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS-REZ-15-003,  
PDS2015-TM-5600, PDS2015-MUP-15-008)**

Dear Mr. Eichar:

We, the San Luis Rey Band of Mission Indians ("Tribe") have received and reviewed the County of San Diego's ("County's") Notice of Preparation ("NOP") of an Environmental Impact Report ("DEIR") for the Harmony Grove Village South Project ("Project") and inquiry whether the Tribe has any knowledge of cultural resources or sacred places that may be impacted by the proposed Project. According to the NOP, the Project's is located in the southeastern-most portion of the Harmony Grove Valley area, between the City of Escondido and the community of Elfin Forrest, within the unincorporated jurisdiction of the County ("Project Area").

As the County is aware, we are a northern San Diego County Tribe whose traditional territory includes Camp Pendleton, the current cities of Oceanside, Carlsbad, Vista, San Marcos and Escondido, as well as unincorporated areas in northern San Diego County, such as the communities of Elfin Forrest, Valley Center, Fallbrook and Bonsall. We are resolute in the preservation and protection of cultural, archaeological and historical sites within all these jurisdictions.

The land in and around the Project area is sacred to the Luiseño people. Our Tribe is aware of many sacred tribal cultural resource sites within close proximity of the proposed Project site and strongly urges caution in assessing the land encompassing the Project for development purposes. The Tribe is aware that in 2006 the Project Location was assessed for the presence of Native American tribal cultural resources. However, this assessment failed to include the presence of a Luiseno Native American monitor. Nor, was the assessment able to provide

necessary information to the County regarding the presence of sensitive tribal cultural resources and/or provide an accurate assessment for a satisfactory review of the Project's cumulative impact to tribal cultural resources, given the age of the assessment and the last eight years of active Native American monitoring in the area, to which San Luis Rey has been an active protector.

Therefore, when evaluating this Project's environmental impact, the Tribe respectfully requests that the County require a Luiseno Native American monitor be present during any and all tribal cultural resource assessments for the preparation of the DEIR, but also that a Luiseno Native American monitor be present during any and all ground disturbing activities such as geotechnical investigations, clearing, grubbing, trenching, excavation, preparation for utilities and other infrastructure, grading, and any other ground-disturbing activity for the Project. This area is incredibly sensitive and warrants the presence of a Luiseno Native American monitor during all ground disturbing activities, pre- and post- DEIR.

The Tribe has enjoyed a mutually respectful relationship with the County over the years and would appreciate an opportunity to discuss this Project's specific potential negative impact on our Luiseño cultural resources in a face-to-face meeting, as requested on July 14, 2015 pursuant to Government Code Section 65352.3, also known as Senate Bill 18.

We appreciate the opportunity to share with the County of San Diego our concerns regarding this Project and thank you for your assistance in protecting our invaluable Luiseño Native American cultural resources.

Sincerely,

A handwritten signature in black ink, appearing to read "Merri Lopez-Keifer". The signature is fluid and cursive, with the first name "Merri" being more prominent.

Merri Lopez-Keifer  
Chief Legal Counsel  
San Luis Rey Band of Mission Indians

cc: Melvin Vernon, Tribal Captain  
Carmen Mojado, Secretary of Government Relations  
Donna Beddow, County of San Diego, Department of Planning & Development Services  
(via email)

**From:** [Molenaar, Amy](#)  
**To:** [Eichar, Peter](#)  
**Subject:** Molenaar NOP Comments: HGV South  
**Date:** Monday, September 28, 2015 1:36:55 PM

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Attention Peter Eichar  
County of San Diego  
Planning and Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123

Dear Mr. Eichar:

This is in regards to PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Thank you for the opportunity to comment on this NOP for the EIR of the Harmony Grove Village South project.

I wanted to note a few concerns that I have.

My address is 9115 Harmony Grove Road and I live “downstream” from this project. My property floods every time we get a half inch of rain and I am certain this additional development and hardscaping will further directly and negatively affect my property and property value and make it even more inaccessible, for longer periods, during the rains. The flooding also affects the streambed and is currently altering it and negatively affecting the flora and fauna that live along the banks – and this is all along the creek as the creek is already over-burdened with runoff during the rains. The flooding also negatively affects the road (9100 block of HG Road) and makes it inaccessible and impassable today if and when there is more than an inch or two of rain. More development and hardscaping along the creek will exacerbate the current problem.

Additionally, I am concerned about my well water as this additional development will certainly leach pesticides and fertilizers into the water table. Me and my family of four have no other water except for which is under the earth and I am extremely concerned about the quality of the water and how this excessive development will affect my family. There are many people in Harmony Grove and Elfin Forest who depend 100% on well water.

I am also concerned about the San Elijo Lagoon and the additional pesticides and fertilizers that will be released into the creek if additional development is allowed in this highly sensitive ecological area. San Elijo Lagoon is already compromised and development along the creek will further compromise the delicate ecosystem of the lagoon.

I am extremely concerned about the traffic implications of additional houses being built along Harmony Grove and Country Club road. There are a lot of accidents on our road currently and traffic goes much faster than the posted speed limits today.

I called DPW a few weeks ago to talk to them about the narrowness of Harmony Grove road in sections and regarding the fact that there is a sharp curve on HG road (9100 block where there have been several fatalities) where the cars travel faster than the speed limit and have, on many occasions, nearly hit me as I am pulling into my driveway. While I wait for the traffic to pass, I have to watch the rear view mirror to make sure no one is going to rear end me and often times I have to wait a minute or two, and fully stop traffic, while I wait for the cross traffic to slow enough so that I can pull into my driveway. Meanwhile, impatient drivers are beeping at me and sometimes attempting to pass me on the left creating an extremely dangerous situation. The DPW representative said to me that ***no one ever expected Harmony Grove Road to handle the traffic that it gets TODAY*** (prior to the full build out of HG Village and HG Village South). It is an absolute fact that our road is not built to handle this amount of traffic and it is dangerous to our residents, motorists and bikers.

The excessive traffic will also affect the wildlife corridor as the roadway is crossed all of the time by deer, coyote, bobcats, raccoons, etc. With more traffic there will be more fatalities for both humans and wildlife. Already, near the HGV South property, we have found injured animals along the road and they are unable to pass through their typical corridor because it is now blocked by fencing. Excessive traffic and more houses encased by concrete walls will have the same negative effect to the wildlife, which have already been squeezed from their broad expanse of territory by development and fires.

With more traffic and more homes there will be no escape for residents when (not if, but when) a fire comes through our valley -- and the fact that HGV South will have only one exit is extremely disturbing as these people, too, will have to pile on to Harmony Grove and Country Club roads (narrow two-laned roads) to escape. We keep motorbikes for this reason already -- maybe it should be a mandate that the residents at HGV South keep motorbikes too as that will be the only way out of our valley in the case of a major fire.

Additionally, I am highly offended by the fact that, should this development be approved, there will be three wastewater treatment plants within 1000 feet of the creek (HAARF, HGV & HGV South). In the event of disaster, this puts our valley and my home at risk for excessive pollution and degradation of the creek and San Elijo Canyon which has always been known to be a rich resource of biodiversity. Additionally, the development of these treatment facility sites along the road is an eyesore.

One thing everyone may also consider is the fact that this HGVS will just simply not fit in with the philosophy of our neighborhood (or our Community Plan) Our communities' philosophy is to "keep it rural," and we know why people move here because we have done surveys: people move here because they like the open spaces and hillsides and recreational possibilities and the potential to keep large animals.

If you review Harmony Grove Village, you will note that its sales are much lower than expected. This is because HG Village does not reflect the "brand promise" of our neighborhood. HG Village delivers only in theory the "brand promise" of big open spaces and a rural feel, but the reality is: People are not buying it (literally) because those homes are not what people who love this area want. People



do not want to live in “city” housing in this rural area – they want big open spaces; they want acreage and green hills and broad expanses and if the County continues to allow “city” development in this area, the developers will continue to develop communities that sell slowly and poorly – further hurting our community and risking transition to apartment and condominium housing to support the developers’ investments. The County needs to align development to the approved General Plan and consider our Community Plan as that is what aligns to the best interest of the developers, the county and the community – this is how we win.

The development of HGV South, *which is contiguous to Del Dios Highlands Preserve*, will destroy the ecosystem and negatively affect the biological diversity of our area -- Del Dios Highlands Preserve is chock full of endangered and threatened species of animal and plants. The development of this space with multifamily housing will overburden the land, our community parks, our creek and our trails, our agriculture and more.

Thank you,

Amy Molenaar  
9115 Harmony Grove Road  
Harmony Grove, CA 92029

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September 28, 2015

San Diego County Planning & Development Services

Attn: Peter Eichar

5510 Overland Avenue, Suite 310,

San Diego, CA 92123

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

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Harmony Grove Village South Project.

We moved to Harmony Grove a few years ago because we fell in love with the rural community. The fact that we have wildlife in our large backyards (most of us have much more than 2 acres), beautiful rolling hills and mountains, pastures, dark skies, no cookie cutter homes, large lots, local farmers and equestrian enthusiasts, friendly neighbors, and a Community Plan that is supposed to keep GPA's and developments out of character from taking over the area. All of these things make Harmony Grove a unique and wonderful place to live and raise a family. We didn't move here to usher in high density developments with HOA's and all the things they bring in that threaten our way of life, and our health and safety.

We are deeply troubled and concerned that the applicants' project will impact our Valley in many significant and irreversible ways, and we object to this project for the following reasons, including but not limited to:

- Biological impacts-Because the property is a major wildlife corridor for species between the area and the Del Dios Highlands Preserve, Elfin Forest Reserve, and the Escondido Creek which connects the Valley to the East and West, we are concerned that this project will not only force these species to either relocate or perish, but we are concerned that the populations of remaining individuals will be greatly impacted. The urban /wildland interface will increase impacts by human contact, roadkill, predation by domestic pets, poisons/pesticides/herbicides used commercially and unmanaged impacts by residents using the surrounding open spaces inappropriately. We know there are several Listed Species in the impact area, and many California Species of Concern and protected species that live here year around. The grasslands are a unique feature that will be lost and no longer supporting foraging for many avian, reptilian, and mammalian species. These impacts should be fully studied in the DEIR. IN addition impacts to the watershed should

include pollution that will inevitably impact local resources all the way to the San Elijo Lagoon where it enters the ocean.

- Fire is a very real and imminent danger to current residents and proposed future residents. The Coco's Fire in 2014 burned the land just west of the project site, in some areas less than 30 feet away from the project site. The proposed project only suggests one egress which would ask for a variance to the County Fire Code for dead end roads. Our property was burned during the Coco's Fire, and we know firsthand how important it is to be able to evacuate safely. Should this project be approved, we could very well be trapped on Country Club Drive behind hundreds if not thousands of people trying to get out of the area. Who will be liable for potential fatalities for this decision to approve a high density project that has no infrastructure to support the growing population of Harmony Grove? Our community has a number of horses and livestock that need to be moved by trailers. This should be analyzed in the DEIR
- Traffic will be greatly increased with 453 units, which will likely add close to 1000 more vehicles on a dead end road that already had problems evacuating during the Coco's Fire. In addition the amount of GHG from added vehicles in the Valley should be considered.
- Inconsistency with the Harmony Grove Community Plan should be fully studied. This project is out of character, and includes a WTF that is not consistent with the community plan.
- Air Quality will be greatly impacted because there is no public transportation in place in the valley, and the area is not realistically a pedestrian community close to amenities. Residents must drive into the City of Escondido or San Marcos to access most of their needs, and this of course does not include commuting to places of work.
- This project claims to be adjacent to the Village of Harmony Grove, when in fact it is not adjacent. The HGV project was carefully planned to have a Village Limit Line and a Community Development Model in place to prevent such claims of "Village Expansion" and leapfrog development surrounding HGV. The original density of the applicants' project site was 25 DU as part of a compromise to keep the high density of HGV at the Core and to feather out to larger equestrian lots. This project applicant is trying to overstep years of thoughtful planning between the community and County, which risks destroying that relationship and goodwill between the community stakeholders and County Planning and Decision makers. A project that honored the original density would avoid most if not all of these significant impacts that cannot be fully mitigated, and be consistent with what stakeholders have already agreed to.

Sincerely,

Angelique and Gus Hartman  
2848 Country Club Drive,  
Harmony Grove, CA 92029

**From:** [Royalviewranch@aol.com](mailto:Royalviewranch@aol.com)  
**To:** [Eichar, Peter](#)  
**Subject:** Harmony Grove Village South NOP comments  
**Date:** Saturday, September 26, 2015 8:28:28 AM

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September 25, 2015

Allen F. & Karen Binns  
2637 Deer Springs Place  
San Marcos, CA 92069  
[Royalviewranch@aol.com](mailto:Royalviewranch@aol.com)

**RE: Harmony Grove Village South**  
**Notice of Preparation of an Environmental Report**

Dear Peter,

I am writing to you today regarding the above project and what needs to be studied in the Environmental Impact Report.

What is the County thinking? Why is this area being inundated with projects? I know it is not the County's job to discourage development but they can advise developers of the problems and issues within a certain area that they wish to develop. This is the 3<sup>rd</sup> project proposed as well as the 3<sup>rd</sup> project that does not conform to the General Plan in this area. I am speaking of the new General Plan that was approved in August 2011.

North County is being inundated with non-conforming projects. Between Lilac Hills Ranch, Newland Sierra, Warner Ranch, Valiano, It just does not seem to end.

This project is fatally flawed. 453 units on 36 buildable acres. A sewage treatment plant next to the Escondido Creek, no secondary access, multi family structures that are 64 feet high (3 ½ stories) as well as no fire evacuation.

I want the County to be sure that they cover all the cumulative effects of the 3 projects. If there is any chance that this project and Harmony Grove Villages are doing construction at the same time (as I am sure they will be) then the cumulative effects of noise, air quality, traffic, etc. need to be studied further regarding the cumulative effects of these developments.

This area is in an "extremely high fire hazard zone". Why do we continue to build homes in these areas? It has been proven that building in these areas have a direct connection to these massive wildfires that the County experienced in 2003 and 2007. It is the same issue



in areas of Los Angeles County. Do we ever learn from these mistakes, or is it all about the Almighty dollar?

There should be no “on street” parking in these communities. Also, we should not be building roads to just the “minimum standard” in these “extremely high fire hazard zones” but we should be building them with enough width that the cars evacuating a wildfire can safely exit as the fire engines are entering the area.

Thank you for your time in consideration in these matters.

Sincerely,

*Allen F. Binns*

*Karen Binns*

**HARMONY GROVE VILLAGE SOUTH**  
**PROJECT NO: PDS2015-GPA-15-002, PDS2015-SP-15-002,**  
**PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008**  
**ENVIRONMENTAL LOG NO: PDS2015-ER-15-08-006**  
**ENVIRONMENTAL IMPACT REPORT (EIR)**  
**NOTICE OF PREPARATION (NOP)**  
**AUGUST 27, 2015 – SEPTEMBER 28, 2015**

This property was designated as Harmony Grove Meadows in 2005 & 2006 for development and the community convinced LAFCO & The department of Planning & Land Use that it was not in our best interest and your agency agreed with our community and denied the density and use of this land in this way.

Now developers are at it again changing the name to Harmony Grove Village South to confuse people where this property is located and to try to say that it is just another part of Harmony Grove Village and this is WRONG.

I have owned this 2 and ½ acres since 1975 joining this land in question with my custom built home at the corner of Country Club Drive and Cordrey Drive.

You have succeeded in allowing Harmony Grove Village to invade our country lifestyle with 742 homes. So I ask where does it end?

Why do you wish to do away with all of our country?

Where is the wild life which we have enjoyed going to live?

Why is it that this land cannot be developed in acreages like we did in 1980?

If they would develop custom homes on acreage, I would have no objection. With this high density, I do OBJECT.

Our valley only has one way in and one way out. We would need at least 3 different ways out. This CANNOT include another exit onto Harmony Grove Road.

I have seen more homes than I can number burn to the ground in 2 fires in our area. One stopping less than 100 yards of my home and another actually coming onto my property where I thought that my home was going to burn. This is not

guessing, it is knowing. This does not include the other fires where we had to evacuate.

How can we approve high density in a fragile environment?

During a fire, with all of these homes, it would trap us in our own dwellings. Can you imagine residents from 742 homes merging with residents from 453 homes along with those who have lived here for years evacuating a fire?

I have experience. All of the homes already being built plus the 453 that this developer is planning on just 111 acres more makes this proposal INSANE.

September 25, 2015

Betty Cavender  
2820 Cordrey Drive  
Escondido, CA 92029  
760-745-8697

**From:** [Bill Osborn](#)  
**To:** [Eichar, Peter](#)  
**Subject:** PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS  
**Date:** Monday, September 28, 2015 3:57:15 PM

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Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

Thank you for the opportunity to comment on the Notice Of Preparation for the EIR of the Harmony Grove Village South project. As you are likely aware, this is the second proposed GPA within a two mile radius for our community. In addition, we are currently dealing with the construction of Harmony Grove Village which has been under construction for more than three years. It is an outrage that developers have swooped in and are essentially destroying our community and our rural ways of life. Many who live in this area have chosen to live here to pursue rural lifestyle. Sadly this is under attack and our communities feel we have taken more than our fair share of development.

This project is being built in an area prone to wildfires. As a former volunteer firefighter for the area, I have witnessed, and fought, several large fires that either burned the area or threatened it. I have evacuated my own home on four occasions in the 13 years I have lived here. Building a project at the proposed densities is building a death trap for its residents. I do not see adequate roadways to support a mass evacuation of this proposed project, Harmony Grove Village, and the existing residents. During the Cocos fire, there were many difficulties with evacuation and we did not have Harmony Grove Village residents to contend with.

The roadways that go through the communities of Harmony Grove, Elfin Forest, and Eden Valley are simply not capable of supporting the traffic volumes of Harmony Grove Village and the proposed Valiano project. Adding in yet another high density development to this already taxed road system simply will not work. Traffic will be backed up in all directions at every intersection.

Aesthetically speaking, the community of Harmony Grove is surrounded



by chaparral covered hillsides and valley floor. This project will be an eyesore with its three story homes which are completely out of sync with the surrounding structures including Harmony Grove Village. In addition, the proposed densities are also out of sync with the surrounding communities.

The applicant for this GPA really should step back and take a long hard look at the damages that will be done should they move ahead with this proposal. I strongly suggest that they look at alternatives that would be more suitable to the surrounding community character and ensure the safety of their future residents.

Regards,  
Bill Osborn  
2952 Milpas Drive  
Eden Valley, CA 92029

**From:** [Bill Osborn](#)  
**To:** [Eichar, Peter](#)  
**Subject:** PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS  
**Date:** Monday, September 28, 2015 3:38:20 PM

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Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

Thank you for the opportunity to comment on the Notice Of Preparation for the EIR of the Harmony Grove Village South project. Friends of Eden Valley for Responsible Development is a non-profit community group dedicated to maintaining consistency throughout our community and our surrounding communities through responsible development in our area.

This proposed project is the second GPA proposal in our area and, like Integrals Valiano project, does not fit into our rural community. There are countless reasons as to why we do not support this project as it is currently proposed, including:

- Proposed densities do not fit the surrounding area.
- Proposed project will do irreparable harm to the communities of Harmony Grove, Elfin Forest, and Eden Valley.
- The road systems cannot support the currently proposed projects (Valiano), which if approved will downgrade many of the surrounding roadways to an F prior to adding traffic from this proposed project.
- The proposed project is unsafe as it is being constructed in the Wildland Urban Interface. This area is prone to major fires and the infrastructure to safely evacuate the area does not exist and this proposal does not appear to address this public health and safety issue.
- Proposing yet another sewage treatment plant (making 4 within a several mile radius) is unacceptable.
- The cumulative impacts of this proposed project, the proposed Valiano project, and Harmony Grove village are too great for the surrounding infrastructure and emergency services.
- The loss of valuable habitat consumed by this proposed project is unacceptable.
- The loss of farmlands is unacceptable.

The area has significant cultural resources which could be lost.

In addition, this proposal should not move forward until the full impacts of the Valiano project are known. There are simply too many projects (Harmony Grove Village, Valiano (GPA), and now this proposal (GPA)) within this small enclosed rural valley for the wildlife and existing communities of Harmony Grove, Elfin Forest, and Eden Valley to survive.

In closing, Friends of Eden Valley for Responsible Development opposes this project as designed.

Sincerely,

Bill Osborn

Co-Chair Friends of Eden Valley for Responsible Development

**From:** [ikey@att.net](mailto:ikey@att.net)  
**To:** [Smith, Ashley](#)  
**Cc:** [Eichar, Peter](#)  
**Subject:** HGV South  
**Date:** Monday, September 28, 2015 2:11:43 PM

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I would like to take this opportunity to express my opposition to the Harmony Grove Village South project. I don't believe that adding over 450 units on a mere 36 acres of land is keeping with the rural character of our community. Nor do I think that it is safe to add that many units without the proper infrastructure needed to evacuate the area in the event of a wild fire. Our roads out of the area are already barely adequate for the current residents to escape in an emergency. Trying to cram that many more people onto those roads will turn them into death traps. Given that this particular development only has a single exit, what will happen if the fire blocks that route?

Chris Racciato  
20774 Elfin Forest Road  
Escondido, CA 92029

**From:** [Doug Dill](#)  
**To:** [Smith, Ashley](#); [Eichar, Peter](#)  
**Subject:** Notice Of Preparation for the EIR of the Harmony Grove Village South  
**Date:** Monday, September 28, 2015 3:24:34 PM

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September 28, 2015

Attention: Ashley Gungle and Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600,  
PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Ms. Gungle and Mr. Eichar:

Thank you for the opportunity to comment of the Notice of Preparation for the EIR of the Harmony Grove Village South project.

**Project Description:**

The significance of the project placement in the rural periphery buffer of the existing Community Development Model is a significant land use impact that should be studied. The overall density of the CDM was calculated to support the commercial area yet balance the number of rural and urban homes in the entire community to preserve the rural political voice; this background information should be disclosed and analyzed in the NOP as the baseline perspective from which to accurately judge project impacts. In addition, all remedies for impact on rural lifestyle proposed by the applicant should be supported by evidence-based research, as the future existence of this historic community is at stake and once destroyed, cannot be replaced. The impact of the potential breach of trust of the agreed overall planning scheme for the valley (please reference 2000-2001 Harmony Grove Community Workshop meeting minutes conducted by the San Diego County Department of Planning and Land Use) should be studied.

**Economic Impact**

The existing Harmony Grove Village is selling very slowly. Today's new home consumers interested in a "Village Model" design wants to be close to neighborhood services and schools. Such services and schools do not exist in Harmony Grove Village and are NOT close by, requiring the use of an automobile to seek such services and schools. The applicant must show by evidence-based research, that there is actually market demand for high density housing in an isolated area such as Harmony Grove.



Is it economically feasible for Harmony Grove to absorb an additional 453 new dwelling units? The Harmony Grove Community needs protection from absentee ownership and a transition to rental use of HGVS if such a project fails to sell to owner occupiers.

### **Land Use and Planning:**

*LU 1.4 vs LU 1.2:* The impact of the determination that the project represents an expansion of an existing village under LU 1.4 should be further evaluated. If the County determines that the meaning in LU 1.4 of “only where contiguous” can be loosened to include “near,” all occurrences of the word “contiguous” in the GP are subject to reevaluation with this new meaning of “near,” and the financial and planning impacts of this decision must be evaluated County wide. If LU 1.4 does not apply, then the project should be evaluated for consistency with LU 1.2, which prohibits leapfrog development with village densities outside of established village or sewer service boundaries. The growth-inducing potential of this high density GPA in Harmony Grove should be evaluated.

### **Public Safety and Services:**

The 453-unit project as currently proposed has only two exits that both lead to Country Club Drive with no intervening intersections, hence they function as one exit. The high number of cul de sacs with limited overall egress points featured in the project design would also be problematic in case of emergency evacuation. The EIR needs to fully analyze evacuation scenarios at full build out of HGV, Valiano, and HGVS - including existing residents and their large animal livestock - with the most recent fire behavior data available, including the 2014 Coco’s fire.

The potential for fatal entrapment of persons and privately owned animals on these rural roads (horse trailer rear exit ramps cannot be lowered if there are cars behind) and even on nearby local highways should be studied as part of this project EIR. Experience with the Katrina disaster has shown that people do not want to leave pet animals behind during evacuations, and therefore the analysis for rural residents, who often have many large animals, should be specially designed to assess this greater risk.

The impact on Federal and State disaster funding of allowing an exception for the County’s Secondary Egress Standards should be studied. Because of the potential for extreme safety hazards and liability to the County, any request for waivers of fire safety-related regulations in this high fire danger area should be supported by evidence-based research proving that granting these waivers has not been demonstrated in case studies of similar rural communities at similar fire risk levels to decrease public safety. If no such case studies exist, the County should perform a cost-benefit analysis, including the likelihood of being sued by existing residents and community organizations, to determine the prudence of becoming the initial case.

The project proposes to use a waste water treatment plant where only septic systems are allowed by the HG CP. The possible cumulative adverse effects on property values of adding a second such facility within sight of the Village treatment plant and thus burdening existing residents who all use septic fields to the odors and impacts of two nearby sewage treatment plants that will provide no possible benefit to them should be studied.

**Recreation:**

The impact on the community's only public park in Harmony Grove Village of the dramatic increase to 453 neighboring homes should be studied and mitigated.

**Transportation and Traffic:**

Country Club Drive and Kauana Loa Drive, both non Mobility Element roads, are at risk of being added back to the Mobility Element Plan due to the added project traffic and impacts of this change on the rural road network should be studied. The added stress of the increased density on the areas' private roads and the financial impact on local residents responsible for maintaining those private roads should be studied and mitigated. The EIR should also study the incremental and specific impact of the project on the construction of long-planned infrastructure like a bridge over the Escondido Creek.

**Agriculture and Forestry Resources:**

Because the HG CP calls for encouraging family owned farms, the impact of removal of these land uses from the project site should be studied.

**Project Alternatives:**

I request that one of the alternatives analyzed be a project feasible in accordance with the HG CP at the original density of the Community Development Model agreed upon by the community and the County (~25 units); that is, 2-acre minimum size lots on septic systems with no sewage treatment plant, and without the need for a GPA, to avoid the mandatory findings of significance. I also wish to propose a project objective: "Provide a development design that will be seen as an improvement to the existing land use plan by a majority of the local residents as well as members of the greater County area."

Thank you for the opportunity to comment.

Douglas Dill  
7909 Faraway Lane  
Elfin Forest, CA 92029-4801



This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)

Peter,

Please find attached our EIR Notice of Preparation Comment Sheet.  
Thanks for your attention.

**HARMONY GROVE VILLAGE SOUTH**  
**PROJECT NO.: PDS2015-GPA-15-002, PDS2015-SP-15-002,**  
**PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008**  
**ENVIRONMENTAL LOG NO.: PDS2015-ER-15-08-006**  
**ENVIRONMENTAL IMPACT REPORT (EIR)**  
**NOTICE OF PREPARATION (NOP)**  
**AUGUST 27, 2015 – SEPTEMBER 28, 2015**

**EIR NOTICE OF PREPARATION COMMENT SHEET**

Community NOP Scoping Meeting  
Wednesday, September 16, 2015  
Elfin Forest Firehouse  
20223 Elfin Forest Road  
Elfin Forest, CA 92029

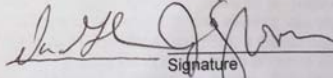
**WRITTEN COMMENT FORM**

To Peter Eichar, & whom it may concern:  
We/I would like to object and comment  
on the County changing the general Plan  
and allowing Harmony Grove Village South to  
proceed for approval.

Brief overview of concerns:

① Fire evacuation safety:

(Attach additional pages as needed)



9/28/15  
Date

Signature

Damon + Jessica Glover  
Print Name

7031 Los Ventos Serenos  
Address

Elfin Forest A 92029  
City State Zip Code

805-729-2259  
Phone Number

**MAIL, FAX or E-MAIL FORMS TO:**

Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
FAX #: (858) 694-3373  
e-mail: [peter.eichar@sdcounty.ca.gov](mailto:peter.eichar@sdcounty.ca.gov)

**COMMENTS MUST BE RECEIVED BY 4:00 PM, SEPTEMBER 28, 2015**

1. **Cont'd:** Evacuating either direction from Elfin Forest would be a disaster during a fire emergency. The Fire evacuation of The San Elijo Hills needs to be taken into consideration, We have many friends who live there and during the 2014 fire evacuation they were all caught in traffic grid lock for up to two hours just to get out of the San Elijo Hills small community. With all the new developments in Harmaony Grove it would be an absolute disaster if we all had to evacuate North West through the San Elijo Hills. Imagine an emergency situation with high winds and fire? It would be a travesty and the County and the developer should be responsible for the human lives!!

2. **Traffic and Safety:**

We are already seeing the impact of the Harmony Grove Village project on our highway and private roads. Many people are passing through our private community roads illegally and driving on Elfin Forest Rd. at much higher speeds than posted, very dangerous for a small road. How is/was this type of busy traffic approved on this small road by the County of San Diego?

3. **Environmental Impact:**

The Harmony Grove Village and Harmony Grove Village South are making a huge impact with nature and wildlife. There are not many areas Left in San Diego County as unique as Elfin Forest and your approval is taking its toll on our wildlife and community. There should be a thorough investigation of endangered species that were overlooked during the approval process for the development. The sewer treatment plant in the proposed development should also be reassessed.

Thank you for your consideration!

Kindred Capital  
Darien Grove  
WESTERN MEDICAL SOLUTIONS, INC.  
800-406-2038 Ex 103  
800-729-2259 Cell  
760-790-0605 Fax  
[www.kindredcapital.com](http://www.kindredcapital.com)

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September 20, 2015

Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

Reference: Harmony Grove Village South PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, Environmental Log No. PDS2015-ER-15-08-006

Dear Mr. Eichar,

Thank you for the opportunity to respond to the Notice of Preparation referenced above, and for your presence and answering questions at the Community NOP Scoping Meeting on Wednesday, September 16, 2015 at the Elfin Forest Fire Station. Please include this letter as one community member's opposition to the project. I oppose the project as proposed for several reasons.

- 1) First, the lack of access for fire fighters and for evacuation of my neighborhood on Cordrey Drive as well as the proposed development. There is only one access to our area through Country Club Road and adding a high density development such as Harmony Grove Village South would make evacuating in a fire almost impossible in a timely manner. During the Coco's Fire in San Marcos in May of 2014 people were stuck in traffic trying to leave their planned development in San Elijo Hills (Figueroa, T. (June 7, 2014). *Coco's Fire Traffic Jams to be Reviewed*. Retrieved from <http://www.sandiegouniontribune.com>). Luckily the fire did not reach them. This traffic jam happened despite the fact that the community normally has three roads to exit the development.
- 2) The proposed density is much higher than what was agreed upon by our community and the county when the Harmony Grove Village development was proposed and the community did not fight against the development because we were told, by county personnel, the county was going to keep the existing areas rural. The density was going to stay across Harmony Grove Road in The Harmony Grove Village and lots would increase in size as the growth moved outward to more closely match existing properties. At that time this parcel under discussion was zoned for approximately 25 homes. This would allow the character of the area to remain the same with rolling hills and valleys rather than steep slopes and hilltops cut for high density housing.
- 3) The map of the proposed development appears to show a reconfiguring of water drainage which would exit the development into a seasonal creek which is on my property. This would increase the water run off to a point that our little creek would be radically changed and our plant life would not survive. The drainage would include the water that would run off the houses, lawns and asphalt of the development bringing fertilizers, trash, and other pollutants from the development across and onto my property.
- 4) The development proposal shows the hilltops being cut off and the valleys being filled so that there will be very large and steep slopes right up against my property line. This would severely impact the view from my property and would likely cause significant run off of sediment onto my property. According to the county people who presented this at the FOP, the developer is asking for a waiver to be allowed to have such steep slopes. I fail to see why the developer should be allowed a waiver as this is a wildfire area and when a fire comes through, the slopes will be denuded of vegetation. The next stage would be mudslides during the rainy season. Our neighborhood should not be forced to deal with the mudslides caused by development that could easily have been prevented by following building codes.

Thank you for taking the time to consider my concerns. If you have any questions about this letter, please feel free to contact me by e-mail at [doneill@catlover.com](mailto:doneill@catlover.com).

Sincerely,

Debbie O'Neill  
2966 Cordrey Drive  
Escondido, CA 92029

**HARMONY GROVE VILLAGE SOUTH**  
**PROJECT NO: PDS2015-GPA-15-002, PDS2015-SP-15-002,**  
**PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008**  
**ENVIRONMENTAL LOG NO: PDS2015-ER-15-08-006**  
**ENVIRONMENTAL IMPACT REPORT (EIR)**  
**NOTICE OF PREPARATION (NOP)**  
**AUGUST 27, 2015 – SEPTEMBER 28, 2015**

## **NOISE / SOUND**

The way that this valley is designed it carries sounds. On Friday night there was football game being played at Mission Hills High School in San Marcos and from our property you could hear the crowds.

Also the concerts being held at the 4<sup>th</sup> of July park inside the Harmony Grove Village can be heard from the property.

There is also an inversion layer in our valley.

Blasting that is still being done over a mile away still affects the animals in our community.

Also we had 2 horses adversely affected by all the blasting and other loud noises. One developed a stone and was able to pass it. Unfortunately the other horse had to be put down.

## **SOCIAL / ECONOMIC**

Allowing this many homes does not go with the character of the community. These are 'country' homes in this valley so there many animals including horses. Where are they going to be able to have animals with these dwellings?

How can you justify having 14 homes per acre next to custom built homes on 2 acres?

## **CUMULATIVE IMPACTS**

The infrastructure nearby and further out cannot handle this project. It will cause a

degrading of all the streets and services.

I have lived here since 1980. With only one road in and the same road out (which closes often with rain), I was not able to get my horses out in the 1997 fire because of the road being closed. Friends and strangers had to walk in and walk the horses out. With the 2014 fire none of the horses were evacuated because of only one road which was cutoff because the fire was on both sides of the road. Also there were neighbors that could not get out.

There have been other fires also where we had to evacuate. There was a time where a volunteer fire truck was over taken because of the fast and changing fire and there was not another road to leave our valley.

Having another exit onto Harmony Grove Road (½ mile from the existing exit) will not be enough especially if you count the residents from the 743 new homes. Besides these residents you will have other residents from Harmony Grove Road and Elfin Forest Roads not counting any others from San Elijo residents.

We need at least 2 others options of escape and exit.

## VISUAL

The developer is wanting to put 3 story homes next to homes that the majority is only single story homes.

The developer is also wanting a slope variation which should NOT be allowed.

The developer is wanting to put a sewer treatment plant next to a year around stream. This will NOT work.

This is COUNTRY not city. People need to have acreage to plant, to cultivate, to raise animals, and to live where they have room.

We took our fair share of over 750 homes in a new development. This is asking too much. If they want to develop custom homes on large acres, we are for that.

## SIDE NOTE

This area is known as Harmony Grove Meadows not Harmony Grove Village South. The developers are trying to confuse people by changing the name.

September 27, 2015

Diana Cavender  
2848 Cordrey Drive  
Escondido, CA 92029  
760-533-1508

Joseph Manrique  
2848 Cordrey Drive  
Escondido, CA 92029  
760-801-3453

Via Email

Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003,  
PDS2015-TM-5600, PDS2015-MUP-15-008, Environmental Log No.:  
PDS2015-ER-15-08-006.

Dear Mr. Eichar:

Thank you for the opportunity to comment on the Notice of Preparation referenced above. As a member of the existing Harmony Grove community, I strongly oppose the Harmony Grove Village South project ("HGVS" or "Project") as currently proposed. Please consider in the Environmental Impact Report (EIR) created in relation to this Project the following negative impacts the Project, as currently conceived, will have on the community:

1. The current plan for HGVS fails to comply with County fire standards that require two egress routes. The Harmony Grove area is extremely vulnerable to fire, as evidenced by the 18 wildfires within three miles of the Project site since 1980. If the County waives the requirement for a secondary egress route, they will be putting residents and fire fighters in danger of being trapped on a single road during an evacuation. It would be irresponsible to ignore the County Fire Code and logical fire safety precautions in a region that can expect wildfires to be an annual danger. Housing development should not be prioritized over the lives of residents.

2. Recognizing that they needed to accept their "fair share" of development, local residents did not fight the HGV Specific Plan when it was approved in 2007. However, the only reason they did not oppose it was because County planning staff assured them that the HGV project represented the community's fair share of dense development and that



the Community Plan would restrict future expansion of urban-style housing. The proposed Project would place more than 450 homes in dense, multi-unit clusters and would destroy the rural character of Harmony Grove. Additionally, approval of the current plan would mean a failure by the County to uphold their promises to the existing community.

Thank you for taking the time to consider my concerns. If you have any questions about this letter, please feel free to contact me by e-mail at [dummer.erin@gmail.com](mailto:dummer.erin@gmail.com)

Sincerely,

Erin O'Neill Dummer  
2966 Cordrey Drive  
Escondido, CA 92029

**From:** [Eric Neubauer](#)  
**To:** [Eichar, Peter](#)  
**Subject:** Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS  
**Date:** Monday, September 28, 2015 1:31:18 PM

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Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

Thank you for the opportunity to comment on the Notice Of Preparation for the EIR of the Harmony Grove Village South project. I live on Cordrey Drive, which is at the Western boundary of the core of this proposed urban development. In addition to teaching I work as a freelance photographer here in San Diego County and have live through many events in many areas. During the last fires, I was one of the last people out of the area by the spiritualist camp as it was burning to the ground. I watched 300+ gallon propane tanks explode and go flying through the air (a large piece missed one of the firefighters by a mere 5 feet!). As I left my house and my neighborhood, the fire was 60 feet from our property line! Adding another 450+ homes to this area is a MAJOR safety concern. We will have more fires. We know that. San Diego has a history of fires that pre-dates the Conquistadores. Nothing we do will stop that. As a community and government, we must ensure the choices we make are going to keep people safe and ensure a reasonable quality of life. Using a conservative estimate of an extra 1000 cars from this proposed development using a road that is only two lanes for enough distance is a cause of concern for me and my family in times of any emergency. See attached pictures from the fire and aftermath within 1/4 mile (and less) of this proposed development area and hopefully you will understand our concern.

In addition to fire-safety, as an 'active' person who enjoys cycling and walking, the additional vehicles sharing a 2-lane road with a large number of cyclists already using it creates another safety threat. Because a developer needs certain numbers to make financial sense, doesn't give good reason to affect our safety. This is a rural area, with a rural infrastructure and roads. Putting a new and separate urban-development in that area will result in people being hurt or killed in traffic accidents and disasters such as fires.

None of the options that have been propose for a second egress are acceptable to help with either of the above issues. There is no way to get people out of the tight valley that is Elfin Forrest and Harmony Grove. Compared to areas that have been developed over the years.....like....say.....the Hollywood Hills, they have a key element that we don't. Many routes of access through fire-prone canyons and passes.

The up-zone of this community was not shared with residents and we were not properly notified at any point that is reasonable or just. ~27 homes is reasonable for this Rural area. Placing almost 500 Condo's is not.

Lastly, with the relatively recent realization of how damaging "Urban Runoff" can be, I wonder why would would put an dense Urban Development right where all of the runoff and it's dedicated sewer treatment plant will feed into a creek that dumps right into San Elijo Lagoon and the Ocean. We have worked hard over several decades to clean up this creek as it feeding into the lagoon near sea-level put San Elijo at one of the Worst-5 polluters of the California Coastline (I can't site the specific study right now.....but that's from the California Coastal Commission based on days of closure to human-water-contact).

Personal and property safety, protection of the sensitive environmental areas, and keeping a rural community rural are very important to all of us.

Thank you for your time and I look forward to your support of our concerns and you preventing an Urban Development that is trying to call itself 'rural' because it's near rural areas when it is, in fact, urban and dangerous for all residents.

**Eric Neubauer**

*Industrial Technology & Art*

**Torrey Pines High School**

[eric.neubauer@sduhsd.net](mailto:eric.neubauer@sduhsd.net)

**MiraCosta College**

[eneubauer@miracosta.edu](mailto:eneubauer@miracosta.edu)

[www.ericneubauer.com](http://www.ericneubauer.com)











**From:** [Smith, Ashley](#)  
**To:** [Eichar, Peter](#)  
**Subject:** FW: Comments to the NOP of the Harmony Grove Village South project  
**Date:** Monday, September 28, 2015 2:18:08 PM

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Looks like you may have already received this comment...

**Ashley Smith**, Land Use/ Environmental Planner  
COUNTY OF SAN DIEGO | Planning & Development Services  
T. 858.495.5375

**\*\*Please note that my email address has changed to [Ashley.Smith2@sdcounty.ca.gov](mailto:Ashley.Smith2@sdcounty.ca.gov) and update your contact information accordingly\*\***

**From:** Frauntene McLarney [mailto:[frauntene@gmail.com](mailto:frauntene@gmail.com)]  
**Sent:** Monday, September 28, 2015 2:17 PM  
**To:** Smith, Ashley  
**Subject:** Fwd: Comments to the NOP of the Harmony Grove Village South project

----- Forwarded message -----

**From:** **Frauntene McLarney** <[frauntene@gmail.com](mailto:frauntene@gmail.com)>  
**Date:** Mon, Sep 28, 2015 at 2:16 PM  
**Subject:** Comments to the NOP of the Harmony Grove Village South project  
**To:** [peter.eichar@sdcounty.ca.gov](mailto:peter.eichar@sdcounty.ca.gov), [Ashely.Gungle@sdcounty.ca.gov](mailto:Ashely.Gungle@sdcounty.ca.gov)

Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600,  
PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

As a member of the vibrant and cohesive community that is Elfin Forest and Harmony Grove, I would like to voice a few concerns I have about the development proposal known as Harmony Grove South.

It is no secret that this ENTIRE area burned almost to the ground just over a year ago, and now to hear that the developer is asking for exceptions to the fire code. That area is SO TIGHT with only one exit and placing such a high density group of housing there would be a fatal mistake when the next fire occurs in this area.

I have a serious issue with the increase in density and zoning changes. This community has worked tirelessly over the past several decades to keep the rural and agricultural integrity of our community. We compromised already once when the current General Plan was approved 2011. I feel like we have suddenly been dealing with the devil when that agreement that was worked on for literally decades, is able to be put into question by developers who just want to make more money, which is exactly what this is. In addition to the increased density, they are looking at changing the Village boundaries and other established definitions what were put into place with all of this work between the county and residents of Elfin Forest and Harmony Grove/Eden Valley. It is my opinion that the General Plan, developed by the county should be the rule that developers have to operate within, not just a worthless document that can be changed at the whim of some developers who want to get richer at the cost of thousands of peoples safety and way of life.

Currently, HGV is just beginning to be built, Valiano has submitted their first draft of their EIR using very old and outdated traffic information. It is not possible to determine if our valleys infrastructure can handle additional cars and traffic of yet a third development until it is seem how the first two actually impact real traffic patterns. As a community who lives, drives and breathes these roads everyday, we have serious concerns for the traffic patterns on Harmony Grove Road, Eflin Forest Road and even San Elijo Road into San Elijo Hills. We know how the traffic actually flows and it is not how the models are predicting. Real-time traffic studies need to be conducted that are CURRENT and need to be inclusive of the traffic that HGV will create. So far, I have not seen any developer use accurate data or even up to date data when looking at traffic patterns.

Thank you for taking into consideration, my concerns as a resident and property owner.

Frauntene McLarney  
19928 Fortuna del Este  
Elfin Forest CA 92029  
[760-579-2993](tel:760-579-2993)

**From:** [Kathryn Kolb](#)  
**To:** [Eichar, Peter](#)  
**Cc:** [Elfin Forest Harmony Grove Town Council](#)  
**Subject:** Harmony Grove South project  
**Date:** Sunday, September 27, 2015 9:23:41 PM

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Sunday, September 27, 2015

Attention: Peter Eichar

County of San Diego

Planning & Development Services

5510 Overland Avenue, Suite 110

San Diego, California 92123

**Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003,  
PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS**

Dear Mr. Eichar:

Thank you for the opportunity to comment on the Notice Of Preparation for the EIR of the Harmony Grove Village South project.

Currently my wife and I are residents of Elfin Forest and are concerned how this project will affect us, our quality of life, safety, and the local wildlife. I'm very familiar with this piece of property. When I was in high school (graduated in 1976), my friends and I would come to Elfin Forest to enjoy the outdoors and nature. When my son was in high school, I also brought him to Harmony Grove/Elfin Forest to enjoy nature and gain a better appreciation of the outdoors.

Having walked the property where the development would go over the last 30 years, I have seen numerous types of wildlife - coyotes, hawks, we've seen kangaroo rats, frogs, rabbits, squirrels, snakes of all kinds, we've even seen knat catchers. The brush and vegetation was also something we enjoyed seeing. At one time there were seasonal ponds in the area. As a cub scout leader, I brought cub scouts out to this area to work on their nature badges and observed oaks, scrub oaks, blue sage, honeysuckle, California lilacs, and numerous wild flowers.

Now a developer wishes to come in and build a development that does not fit the community plan or local zoning and plans to destroy all these things in nature that I've enjoyed over the last 30 years. I feel there's no integrity in the developer or the

county planners that they would consider such a project. I do not understand how individuals who wish to build a home and make the community better, adhere to the rules, regulations and zonings where as the developer with no motivation other than greed is able to propose and even have a project considered that does not conform to the community plan, local ordinances, fire regulations, and zoning.

Our other concerns are:

--[if !supportLists]-->• <!--[endif]-->Traffic congestion

<!--[if !supportLists]-->○ <!--[endif]-->Elfin Forest Rd/Harmony Grove Road to the west of the development are extremely narrow, winding and dangerous under the best of circumstances. On any Saturday or Sunday, hundreds and hundreds of bicyclists ride back and forth on Harmony Grove and Elfin Forest Roads between San Elijo Rd and Country Club Dr. causing added danger, congestion and frustration.

<!--[if !supportLists]-->○ <!--[endif]-->This year during the Cocos fire, the congestion and traffic in San Elijo Hills was snarled and at a stand still for hours. If the fire were upon us, many people would have died. From our home, just off of Elfin Forest Rd., there's only one of two ways to go to evacuate, one of which goes right by Harmony Grove Village and the new proposed development.

--[if !supportLists]-->• <!--[endif]-->I'm extremely anxious that during an emergency that our escape route will be congested and dangerous, even life threatening because of development in Harmony Grove.

--[if !supportLists]-->• <!--[endif]-->On any given day, Elfin Forest/Harmony Grove Roads become congested and a bottleneck. The developers justify their development by saying that the access is going to be to the east. Yet, EF/HG is one of the few east/west alternative routes. You're either using Highway 78, Elfin Forest Road, or Del Dios Highway to get from Escondido to the west.

--[if !supportLists]-->• <!--[endif]-->We believe there needs to be a study on how the future developments are affecting local surface roads.

--[if !supportLists]-->• <!--[endif]-->Our children are grown but our neighbor's grade school aged children have to travel all the way to Miller school in Escondido more than 7 miles from here. How do developers justify building homes for young families when the school for children is so far away?

We believe this project to be not well thought out, not well planned, does not belong to the community or fit the community plan, and that greed is the sole motivator for the developer to propose such a project. It is our hope and our prayer that our local planners and county officials will only approve a project that fits the community plan that so many people have worked hard on for so many years and will conform to local building codes and not harm our environment or wildlife.

Regards,

Farron & Kay Kolb

Farron & Kay Kolb

20125 Colina Encantada Way

Elfin Forest, CA 92029



Attention: Peter Eichar  
County of San Diego Planning & Development Services  
5510 Overland Avenue, Suite 110, San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

Thank you for the opportunity to comment on the Notice Of Preparation for the EIR of the Harmony Grove Village South project. Live on Country Club Drive, just north of this proposed project.

While I find all the GPA's that are current proposed primary in District 5 unacceptable, this one is by far and insult to the whole process! Putting 453 three-story condos on 36 acres, using the loop-hole of "clustering" to say that this is ½-acre semi-rural density...seriously???

There are countless reasons as to why we do not support this project as it is currently proposed, including:

- This property received an up-zoning during the General Plan and should not be allowed to turn right around and ask for more. The proposed densities do not fit the surrounding area, nor the Village concept.
- Proposed project will do irreparable harm to the communities of Harmony Grove, Elfin Forest, and Eden Valley.
- The road systems cannot support the currently proposed projects and will downgrade many of the surrounding roadways to an F prior to adding traffic from this proposed project. Contributing money into the TIF is not acceptable to those of us who will still have to use these roads to get to our homes.
- The roadways immediately outside the County area (Nordahl & Mission, Barham Dr at the industrial center, Nordahl and 78, 78 & 15, Elfin Forest Rd & San Elijo Rd, ) MUST BE STUDIED within this proposed project. Add in the 2185 proposed homes for Newland Sierra and the 1700 proposed homes for Lilac Hills and the current freeway (15 & 78) will come to a halt.
- The proposed project is unsafe as it is being constructed in the Wildland Urban Interface. This area has recently had a major fire (Cocos Fire, May 2014) and has been affected by many in recent years, including the Harmony Grove Fire. The infrastructure to safely evacuate the area does not exist and this proposal does not appear to address this public health and safety issue.
- The loss of valuable habitat consumed by this proposed project is unacceptable. Mitigation should be done locally.
- The loss of farmlands and potential equestrian estates is unacceptable.

I am opposed to the GPA on this proposed project, and find it an insult to those of us who have lived here and been promised that Harmony Grove Village would be "our fair share of the growth" with the General Plan.

Sincerely,  
Janean Huston  
1023 Country Club Drive  
Escondido, CA 92029

**From:** [Jim McKim](#)  
**To:** [Eichar, Peter](#)  
**Cc:** [angeliquehamel@hotmail.com](mailto:angeliquehamel@hotmail.com)  
**Subject:** comments on NOP for Harmony Grove Village South  
**Date:** Monday, September 28, 2015 3:58:21 PM

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Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

Thank you for the opportunity to comment on the Notice Of Preparation for the EIR of the Harmony Grove Village South project. The following are my concerns related to the proposed project:

**Public Safety** - The project proposal does not include adequate egress for the number of residences. The area is on a single access road (Country Club Drive) over Escondido Creek (which is prone to flooding) and is an urban-wildland interface area with relatively high fire danger. Country Club Drive barely supports the current residential load in times of emergency, as demonstrated in the recent Cocos Fire.

**Zoning** - Harmony Grove Village was approved by the BoS, putting 600-plus homes in an otherwise rural area but with the understanding by the existing community that that was "it" and that the density on the project would taper toward the perimeter. The area of the proposed project was slated for 25 residences in the General Plan before a last-minute "alternate" plan was approved by the BoS that increased the zoning seven-fold to 174. Adding any more than that, as proposed, is totally contrary to the original General Plan proposal and greatly exceeds even the alternate plan and violates the tapered density of Harmony Grove Village.

**Community Character** - The proposed project is not at all consistent with the rural character of Harmony Grove, where lots have historically ranged from half-acre to 10 acres and residents keep large animals, raise gardens and fruit trees, and enjoy the peace and quiet. High-density, multi-family tract homes will destroy the character and aesthetics of the area and negatively impact the quality of life of the current residents.

**Biological** - The Harmony Grove area is part of the rapidly-diminishing coastal sage scrub habitat and important open space for native species, including but not limited to deer, bobcat, mountain lion, racoon, coyote, roadrunner, hawks, owls, snakes, and many other plants and animals. The proposed project would cause irreversible and significant impact on the biodiversity and ecosystem of the area.

**Traffic** - The corridors into and out of the area (Harmony Grove Road & Country Club Drive) were not designed to support, and aren't capable of supporting, the volume of traffic that would be created by the proposed project. We have not yet begun to see the effect of the Harmony Grove Village project and these roads can already be

busy at times. Harmony Grove Road is a narrow, winding county road with no shoulders that is popular with bicyclists who live elsewhere and people using the road as a shortcut to and from work. It is the only east-west road through the area. Adding more users is a recipe for traffic nightmares, accidents and injuries.

Water Runoff - The amount of hardscape created by the roads and roofs of the proposed project would generate significant runoff during storms. The drainage to the south as shown on the plan will not handle that much runoff. Properties along Cordrey Drive and Cordrey Lane will be impacted by both storm runoff and by the "urban drool" created from irrigation, fertilizers and pesticides up-slope. Harmony Grove Creek is already at full capacity during storms due to all the development upstream in the Escondido valley; adding more in the Harmony Grove area will compound the problem.

Sincerely,

James McKim  
2864 Cordrey Drive  
Escondido, CA 92029

**From:** [Julie Neubauer](#)  
**To:** [Eichar, Peter](#)  
**Subject:** Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS  
**Date:** Monday, September 28, 2015 2:07:33 PM

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Dear Mr. Eichar:

Thank you for the opportunity to comment on the Notice Of Preparation for the EIR of the Harmony Grove Village South project. I live on Cordrey Drive, which is at the Western boundary of the core of this proposed urban development. In addition to being a local teacher, I am also a native San Diegan who has experienced many changes around the county. I am deeply concerned about the proposed changes to my neighborhood. Adding another 450+ homes to this area is a MAJOR safety concern. First off, we will have more fires. We know that. San Diego has a history of fires that pre-dates the Conquistadores. Nothing we do will stop that. As a community and government, we must ensure the choices we make are going to keep people safe and ensure a reasonable quality of life. Secondly, using a conservative estimate of an extra 1000 cars from this proposed development using a road that is only two lanes for enough distance is a cause of concern for me and my family in times of any emergency, not to mention the quality of our daily life.

In addition to fire-safety, as an 'active' person who enjoys cycling and walking, the additional vehicles sharing a 2-lane road with a large number of cyclists already using it creates another safety threat. Because a developer needs certain numbers to make financial sense, doesn't give good reason to affect our safety. This is a rural area, with a rural infrastructure and roads. Putting a new and separate urban-development in that area will result in people being hurt or killed in traffic accidents and disasters such as fires.

None of the options that have been propose for a second egress are acceptable to help with either of the above issues. There is no way to get people out of the tight valley that is Elfin Forrest and Harmony Grove. Compared to areas that have been developed over the years.....like.....say.....the Hollywood Hills, they have a key element that we don't. Many routes of access through fire-prone canyons and passes.

The up-zone of this community was not shared with residents and we were not properly notified at any point that is reasonable or just. ~27 homes is reasonable for this Rural area. Placing almost 500 Condo's is not.

Lastly, with the relatively recent realization of how damaging "Urban Runoff" can be, I wonder why would would put an dense Urban Development right where all of the runoff and it's dedicated sewer treatment plant will feed into a creek that dumps right into San Elijo Lagoon and the Ocean. We have worked hard over several decades to clean up this creek as it feeding into the lagoon near sea-level put San Elijo at one of the Worst-5 polluters of the California Coastline (I can't site the specific study right now.....but that's from the California Coastal Commission based on days of closure to human-water-contact).

Personal and property safety, protection of the sensitive environmental areas, and keeping a rural community rural are very important to all of us.

Thank you for your time and I look forward to your support of our concerns and you preventing an Urban Development that is trying to call itself 'rural' because it's near rural areas when it is, in fact, urban and dangerous for all residents.

--

Julie Neubauer  
Humanities Teacher  
Varsity Softball Coach

Steele Canyon High School



Joan Spilis  
880 Hailey Ct.  
San Marcos, CA 92078

September 27, 2015

To: Ashley Gungle, Project Planner and Peter Eichar, Environmental Coordinator for  
San Diego County Planning and Development Services  
Cc: Town Council of Elfin Forest Harmony Grove

**Regarding: Harmony Grove Village South (HGVS) Project Notice of Preparation for the EIR**

I write this letter to provide some insights as a San Marcos resident and Cocos fire survivor. A resolution should be voted down to create the HGVS community and other home development projects in the already congested areas between San Marcos and Escondido. My concerns have to do with the following:

- **Fire Hazard** – which is a real threat based on the Cocos fire and others in the North County area on May 14, 2014. I was one of the residents trying to flee the fire area but was instead stuck in a car on Wild Canyon Road for 75 minutes as the huge black column of smoke turned into a gigantic plume of fire raging just over the hill. If it were not for a sudden wind change that blew the fire toward the East, we could have died there. North County is lacking major evacuation/escape routes. Example: We have only 2 evacuation routes; one of them was in the fire area and the other was jammed with traffic. As the flames shot high over the hill, the feeling of terror escalated as we drivers called 911 to get us out of there.
- **Increasing Drought** – makes current low water supplies dwindle with new homes added for water service, in addition to less water supply for fighting fires.
- **Increased Traffic** – to the already grid-locked roads at rush hour and other times in between such as school dismissal times; evacuation would be impossible.
- **Encroached Wildlife Habitats** – animals have had to migrate further east since their habitats are being taken over. This is evident in the San Elijo Hills area where much of the wildlife has had to move from here.

With all due respect for your positions, individuals who make decisions on housing expansion within the county should be required to physically drive around our communities during various times of day and evening to experience the objections of current North County residents. HGVS and other housing developments should not be located in an area that will have fires in the future, lack essential water supply and sufficient evacuation routes, cause more road grid-lock and take over wildlife habitats.

Why would decision-makers put women, men and children at risk when you know that these areas in drought-like conditions will have fires again and this time the outcome may be disastrous? This safety issue should stop all new home developments in our area until more escape roadways are created and drought conditions reverse.

Sincerely,  
Joan Spilis  
joan\_spilis@aol.com

**From:** [Jean Walton](#)  
**To:** [Eichar, Peter](#)  
**Subject:** Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS  
**Date:** Monday, September 28, 2015 2:03:33 PM

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Dear Mr. Eichar:

Thank you for the opportunity to comment of the Notice Of Preparation for the EIR of the Harmony Grove Village South project.

I have been a resident of Harmony Grove for 20 years and have seen the traffic in front of my house increase to the point I thought I lived on the freeway. From 5:30am until at least 7:00pm every night it is practically non stop with people using my street to get to the coast either to or from work or from the new homes being built further west of my residence.

I can only imagine what the traffic will be like with the new proposal with the Harmony Grove Village south project. This is not in keeping with our rural atmosphere. The main reason I chose to move here in the first place.

Thank you for consideration

Jean Walton  
2382 Harmony Grove Rd  
Escondido, CA 92029

September 27, 2015

**Via Email**

Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

**Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS**

**Comments on Notice of Preparation**

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Dear Mr. Eichar:

Thank you for the opportunity to comment of the Notice Of Preparation for the EIR of the Harmony Grove Village South project ("HGVS" or "Project"). As a member of the Harmony Grove community, I am strongly opposed to the Project as depicted in the proposed Site Plan. Any Environmental Impact Report (EIR) created in relation to this Project should consider the following significant impacts that the Project, as it is currently conceived, will have on the community:

1. The current Plan does not provide sufficient means to evacuate the proposed number of residents in the event of a disaster. As you are likely aware, the Harmony Grove area is extremely vulnerable to fire. In 1997, the Del Dios fire, which burned 1,072 acres and destroyed two homes, ravaged the neighborhood. The property where my home currently stands was burned in that fire. In May 2014, a massive wild fire again passed through Harmony Grove. The Cocos fire, which blackened nearly 2,000 acres, destroyed more than 20 structures in Harmony Grove, including much of the Harmony Grove Spiritualist community (located approximately 0.25 miles from the proposed HGVS site). Indeed, in the past 20 years, the residents of Harmony Grove have been evacuated due to fire on numerous occasions, often more than once in a single year.

Because fire is an ever-present danger in Harmony Grove, it is essential that any proposed construction be scrutinized to determine whether it will threaten the ability of residents to safely evacuate the area. Currently, the Site Plan proposes 453 dwellings in 229 structures. All of these additional residents, as well as the current residents, would be required to evacuate in the same direction using Country Club Dr., a single lane, country road. There is a high likelihood that the proposed project will increase the risk of injury or death to Harmony Grove residents, by making it impossible for all residents to evacuate in a timely fashion in the event of a fire. Therefore, any EIR should address the impact this Project will have on the ability of residents to evacuate in the event of a disaster, including a calculation of the time required to evacuate the proposed number of

residents given the available egress. The EIR should also consider how residents will be evacuated if the sole egress becomes blocked.

2. The current plan proposes the construction of a storm drain in the southwest portion of the Project. This storm drain would alter the existing drainage patterns in the area, by draining water from HGVS on to my family's property at 2966 Cordrey Drive. The EIR should evaluate the impact that this will have not only on my family's parcel, but on the parcels to the west of us. Among the impacts that should be considered are the clear danger of flooding, erosion, damage to plants and other landscaping, drainage of pollutants from HGVS onto our property and any other impacts that may result from the storm drain. Obviously this will require an evaluation of the amount of water that will be drained onto our parcel.
3. The density of the Project is highly inconsistent with the character of our community. The proposed zoning changes which would permit this higher density housing must be assessed carefully.
4. The Project proposes the creation of a massive slope next to my family's property line. This would significantly impact the view from our property. Additionally, this slope would increase the risk of mudslides or landslides onto our property, which may result in property damage. Fire also tends to travel faster up a slope, with steeper slopes often resulting in faster moving fires. Therefore, the proposed slope will increase the risk of fire damage to the surrounding area. These impacts should be examined in the EIR.

Thank you for taking the time to consider my concerns. If you have any questions about this letter, please feel free to contact me by telephone at (760) 213-5008 or by email at [jdummer@rkglawyers.com](mailto:jdummer@rkglawyers.com).

Sincerely,



Jessica Faith O'Neill Dummer, Esq.  
2966 Cordrey Drive  
Escondido, CA 92029



September 28, 2015

**Via Email**

Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

**Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS**

**Comments on Notice of Preparation**

---

Dear Mr. Eichar:

Thank you for the opportunity to comment on the Notice Of Preparation for the EIR of the Harmony Grove Village South project ("HGVS" or "Project"). As a member of the Harmony Grove community, I am strongly opposed to the Project as presented in the NOP. Any Environmental Impact Report (EIR) created in relation to this Project should consider the following significant impacts that the Project, as it is currently conceived, will have on the community:

The proposed Project is not consistent with the General Plan or Community Plan. Rather, the Project flatly contradicts numerous, fundamental Plan policies and violates the Community Plan's central purpose: to maintain the community's rural character.

The Project would violate the General Plan's restrictions on expanding existing rural villages. The county should not let the developer change the meaning of "contiguous.". HGVS is not contiguous but rather several hundred feet from the Village Limit Line. Additionally, the Community Plan explicitly states that this limit line defines the boundaries of the village and prohibits urban-style growth outside of this limit line.

The Community Plan requires that new development utilize on-site septic systems, which helps maintain the large-lot, rural atmosphere. Rather HGVS will utilize an on-site sewage treatment plan to build 453 homes, completely over whelming the existing large lot residences and all but destroying the rural nature of Harmony Grove.

The Harmony Grove Village envisioned that there would be a transition to the surrounding rural and semi-rural lands. See Harmony Grove Specific Plan at 21 ("As a general rule, homes and lots will be smaller near the core and grow progressively larger the more distant they are from the core area. At the perimeter . . . some individual lots will exceed two acres in size"), 22 (map showing that only equestrian/limited residential, and park/recreation/open space uses are allowed in the portion of the specific plan area to the south of the village limit line). Instead of restricting



dense development to village cores and reducing density at the edge of villages, the Project would place dense development at the edge of HGV as well as at the edge of the HGVS Project.

The density of the Project is highly inconsistent with the character of our community. Just a four square acres of HGVS contiguous with the eastern boundary of my 4 acres at 2966 Cordrey Dr would contain approximately 50 residences. There are currently, south of the intersection at Harmony Grove Rd. and Country Club Drive, less than 40 total residences, mostly on large lots.

The Project fails to comply with County fire standards that require two egress routes. The Residents of Harmony Grove have been evacuated no less than five times in the last 15 years, including for two fires which destroyed homes in Harmony Grove. In 1997, the Del Dios fire, burned 1,072 acres and destroyed two homes. In 2014 The Cocos fire, blackened nearly 2,000 acres, destroyed more than 20 structures in Harmony Grove, including much of the Harmony Grove Spiritualist community (located approximately 0.25 miles from the proposed HGVS site). So it is safe to say the question is not if, but when, a future major wild fire will hit Harmony Grove. When that fire comes it is probable that one egress will not be adequate to evacuate the residents leading to a loss of life.

The current plan proposes the construction of a storm drain in the southwest portion of the Project. It appears that this storm drain would alter the existing drainage patterns in the area, by draining water from HGVS on to my property at 2966 Cordrey Drive. The EIR should evaluate the impact that this will have not only on my property, but on the properties to the west of us. Among the impacts that should be considered are the clear danger of flooding, erosion, damage to plants and other landscaping, drainage of pollutants from HGVS onto our property and any other impacts that may result from the storm drain. Obviously this will require an evaluation of the amount and quality of water that will be drained onto our parcel. Currently all water that runs through our seasonal creek is filtered by the natural plants and terrain that exist. Water which runs off of the cement, roofs, and asphalt may contain significantly more pollutants.

The Project proposes the creation of a massive slope next to my property line. This would significantly impact the view from our property. Additionally, this slope would increase the risk of mudslides and/or landslides onto our property, which may result in property damage. Fire also tends to travel faster up a slope, with steeper slopes often resulting in faster moving fires. Therefore, the proposed slope will increase the risk of fire damage to the surrounding area,

Thank you for taking the time to consider my concerns. If you have any questions about this letter, please feel free to contact me by telephone at (760) 747 3782 or by email at [jdummer@surfaceoptics.com](mailto:jdummer@surfaceoptics.com).

Sincerely,

Jonathan D. Dummer  
2966 Cordrey Drive  
Escondido, CA 92029

**HARMONY GROVE VILLAGE SOUTH**  
**PROJECT NO.: PDS2015-GPA-15-002, PDS2015-SP-15-002,**  
**PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008**  
**ENVIRONMENTAL LOG NO.: PDS2015-ER-15-08-006**  
**ENVIRONMENTAL IMPACT REPORT (EIR)**  
**NOTICE OF PREPARATION (NOP)**  
**AUGUST 27, 2015 – SEPTEMBER 28, 2015**

**EIR NOTICE OF PREPARATION COMMENT SHEET**

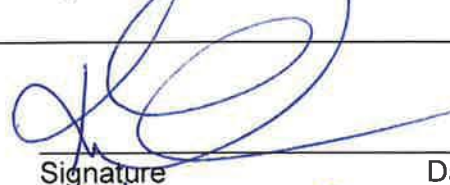
Community NOP Scoping Meeting  
Wednesday, September 16, 2015  
Elfin Forest Firehouse  
20223 Elfin Forest Road  
Elfin Forest, CA 92029

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**WRITTEN COMMENT FORM**

I do not agree with this proposal.  
They have not considered the fire evacuation impact. The amount of people would not allow everyone to get out alive.

(Attach additional pages as needed)

 9/16/15  
Signature Date

Katrina Stainton  
Print Name

6856 Los Vientos Serenos  
Address

Elfin Forest 92029  
City State Zip Code

760-213-3975  
Phone Number

**MAIL, FAX or E-MAIL FORMS TO:**

Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
FAX #: (858) 694-3373  
e-mail: [peter.eichar@sdcounty.ca.gov](mailto:peter.eichar@sdcounty.ca.gov)

**COMMENTS MUST BE RECEIVED BY 4:00 PM, SEPTEMBER 28, 2015**

**HARMONY GROVE VILLAGE SOUTH  
PROJECT NO.: PDS2015-GPA-15-002, PDS2015-SP-15-002,  
PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008  
ENVIRONMENTAL LOG NO.: PDS2015-ER-15-08-006  
ENVIRONMENTAL IMPACT REPORT (EIR)  
NOTICE OF PREPARATION (NOP)  
AUGUST 27, 2015 – SEPTEMBER 28, 2015**

**EIR NOTICE OF PREPARATION COMMENT SHEET**

Community NOP Scoping Meeting  
Wednesday, September 16, 2015  
Elfin Forest Firehouse  
20223 Elfin Forest Road  
Elfin Forest, CA 92029

---

**WRITTEN COMMENT FORM**

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*See attached.*

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(Attach additional pages as needed)

**MAIL, FAX or E-MAIL FORMS TO:**

Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
FAX #: (858) 694-3373  
e-mail: [peter.eichar@sdcounty.ca.gov](mailto:peter.eichar@sdcounty.ca.gov)

*Linda McKim* 9-17-15  
Signature Date

*Linda McKim*  
Print Name

*2864 Cordrey Dr.*  
Address

*Escondido, CA 92029*  
City State Zip Code

*760-745-4035*  
Phone Number

**COMMENTS MUST BE RECEIVED BY 4:00 PM, SEPTEMBER 28, 2015**

## WRITTEN COMMENTS REGARDING HARMONY GROVE VILLAGE SOUTH

1. The name Harmony Grove Village South is deceiving since it is NOT associated with the present project Harmony Grove Village. Because of this, there should NOT be more density built beyond the present village. The neighborhood voted for the General Plan Proposition S years ago for low density housing. This meant only 25 homes should be built on the property behind us proposed as Harmony Grove Village South. More homes have been rezoned in number and that should be considered illegal. Proposition S should be the final say with no increases.
2. Drainage is already a problem and more homes and condos on the hillside will produce even more runoff through the yards and into the creek. Presently, there are enough problems with runoff onto the neighbors' yards and driveways.
3. There are enough problems with drought conditions without adding more homes to the San Diego area. We should look ahead to save water, not use it all up. There may be a time when we can not obtain enough water from the Colorado River. Then what? Just because you can buy water doesn't mean there will always be some.
4. My main concern is the fact that we need more access out for fire evacuation. Presently, we have only Country Club Drive to the north to Auto Parkway and Harmony Grove Road to the east to Hale and Valley Parkway. That is not adequate to evacuate people, horses, etc. We cannot consider evacuation through the canyon to San Elijo Hills because they proved that evacuation during the Coco's fire was dangerous. Cars could not use Twin Oaks Valley Road to the north since it was next to the fire. The cars going south to Rancho Santa Fe were congested for a couple hours trying to evacuate. If they try to evacuate out our end and vice versa, there would be cars and trucks lined up through the whole canyon.
5. Would a sewage plant next to the creek be legal? We do not want the smell of the sewage plant. The one located on Hale smells a lot!

Thank you for letting me give my reasons why Harmony Grove Village South with more than 25 homes would not be practical in our rural atmosphere. We cherish our rural living and my family has lived here for 30 years. Please do not destroy it.



Linda McKim  
2864 Cordrey Drive  
Escondido, CA 92029  
760-745-4035  
Lindamckim47@gmail.com

Laura H. Mitchell PhD  
Trust of Laura H. Mitchell  
2855 Cordrey Dr.  
Escondido, CA 92029  
760.745-9819  
lali\_mitchell@juno.com

Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

**Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003,  
PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006,  
HGVS**

Dear Mr. Eichar & Ashley Gungle:

Thank you for the opportunity to comment on the NOP for the EIR for the Harmony Grove Village South project. I am a property owner of two parcels along Cordrey Dr., (2855 Cordrey Dr - 6ac) & Country Club Dr (2842/2844 - 1 ac) directly below the proposed HGVS project. The following comments regarding the fundamental environmental and community problems with this proposed project poses are stated below.

1. I oppose the proposed re-zoning for the HGVS proposed build out. The original zoning for our area came with negotiations with the County back when the HGV development was being planned. Community stakeholders established with county planners that we wanted this land to remain rural, and keep the development/density where HGV stands today (north of HG Road). And thus a Village Limit Line was established, to keep the density of HGV at its core, and larger lots would feather out around the site. I do not support GPA's or projects that conflict with the HG Community Plan. This present project (HGVS) proposes 453 dwelling-units on 36 acres. I do not support this density as appropriate or safe for this area or the building of multi-family 2 - 3 story units (condos) as appropriate for this area.

2. This proposed build out is abutting a large natural preserve which makes it entirely inconsistent with the protection of margins between natural wildlife



preserve and community build out. This densely populated project is completely inappropriate for this area.

3. Fire safety: there is no safe evacuation routes. This area is an extreme fire risk corridor. The current plan proposes a loop with all traffic emptying out on the Country Club Dr/ Harmony Grove Rd intersection. Even if a road is pushed through at the west end of Country Club Dr., that exit route would also be on Harmony Grove Rd. A major fire would be a human disaster in terms of evacuation! (The emergency evacuation road indicated on the current HGVS plans above the Barnard property is a joke. This is private property with a dirt road suitable only for 4-wheel drive) .

4. This project (as it stands) requires a number of infrastructural changes that really demand a GPA. The cost to fix the bridge, for a secondary egress (or not), waste treatment etc just doesn't pencil out. There will be continued pressure to build more units if such a proposal is approved. Developer has proposed 229 residential/multi residential structures, it is likely that the lowest number of units will be above 229 units, which increases the lack of compatibility of this project for this area even more!

5. With the Harmony Gove Village project (partially completed) and the Vallejo Project breaking ground, and other projects in the wings, there is a need to look at a coordinated development of this whole area in terms of water, roads, fire safety, community character and integration etc so that rampant uncoordinated development does not create disastrous unbridled infrastructure and environmental problems.

6. It is misleading for the HGVS proposed project to call themselves such. It is a completely separate project from the HGV. It is not an extension of HGV. This linguistic "fusion" seems to be a way of justifying village core density in HGVS. The proposed density is completely unsuitable for the area in terms of community character, fire safety, wildlife and natural habitat protection. The community along Cordrey Rd abutting this HGVS proposed development is a well established integrated community with most of the properties purchased (for single family residences) from 1960 to 1980's. Our children grew up together, we are a cohesive historically rooted community, we are deeply dedicated to the importance of our rural character and to the preservation of the natural habitat we share our environs with. The disparate impact of a project such as HGVS will be devastating to the unique community-character of our existing community. It will tower above Cordrey Dr. bringing in noise pollution, light pollution, traffic , sudden population growth of a non-rural more commuter oriented building use, untenable congestion to begin, with as well as unsustainable and inappropriate land-use of the 100 or so acres of open space the proposed project would encroach upon.

7.I request that a study of the Cordrey/Country Club community character and impact of such a development be included in the EIR. So far I have heard comments that the Cordrey Dr community (with an up zone from 4 to 8-acres) established by the GP2020 which makes it impossible for residents to divide their land if they so wished to) will be a fire protection zone for the new HGVS. Are we the "infantry" fodder-properties that will fall first and thus protect HGVS?

Sincerely,

A handwritten signature in cursive script that reads "Laura Mitchell".

Laura H. Mitchell PhD  
The Laura Mitchell Trust  
Property owner of:  
2855 Cordrey Dr & 2842 & 2844 Country Club Dr  
Escondido, Ca 92029  
760-745-9819

September 27, 2015

Mary A. Bennett  
880 Hailey Court  
San Marcos, CA 92078

To: Ashley Gungle, Project Planner and Peter Eichar, Environmental Coordinator for the San Diego County Planning and Development Services  
Cc: Town Council of Elfin Forest Harmony Grove

To All Concerned:

I am writing to provide comments on the Harmony Grove Village South (HGVS) community project and Harmony Grove expansion projects in area between San Marcos and Escondido. I write as a Cocos fire evacuee and lucky survivor of that catastrophe. My concerns and feedback follow:

- **Road Congestion:** North County already suffers from extreme road congestion. Current residents already need to schedule errands and discretionary road trips around school and work rush hours due to road congestion, and still the traffic is often heavy. It makes no sense to add more residents who add to the traffic problems, unless builders are required to implement necessary road improvements before breaking ground.
- **Wildfire Safety Risks:** On May 14, 2014, about 3:30pm, I hurriedly grabbed my two pets and set out to evacuate my Altaire neighborhood due to the imminent threat of the Cocos fire. I drove a short distance to Wild Canyon Road, the only escape route open because the fire cut off the only other route, Double Peak Road. I found myself in a line of traffic that did not move for more than one hour. In that hour, the column of black smoke over the hill in back of the neighborhood thickened and towering flames leaped over the top. Traffic was gridlocked with many of us desperately calling 911 for rescue. For the first time in my life, I thought I was going to die. It appeared that the fast moving fire would sweep down the hill at any minute and we all would die where we sat. If the wind hadn't shifted just at the right time, I am convinced I would not be here now.

The issue of limited evacuation routes is a problem throughout the County, a problem made worse by the road congestion mentioned above. Adding more residents without remedying the traffic infrastructure will only further play roulette with human lives. Will it take a massive loss of life in a future wildfire to finally address the issue? We need more evacuation routes for the current population, not more people to evacuate.

- **Drought:** The California drought is deepening with serious concerns about water shortages for the current population throughout San Diego County. And new communities are being considered? This makes no practical sense. Not only will this put a bigger burden on the water supplies, needed by current residents, it will decrease critical supplies for firefighting.
- **Environmental Impact:** Areas of open land need to be preserved to sustain the ecology, beauty and wildlife habitats of our County. More people and more human use of the land will irreversibly damage or destroy all of these treasures.

It seems clear that those making the decisions about building the HGVS community or expanding Harmony Grove do not live in the areas impacted. Letters like this one would certainly not be necessary if they did. I suggest that before decisions are made about more building, decision makers need to drive through the impacted areas to experience the traffic and ask the locals if the issues cited above are realities. Only then will the right decision against more building be crystal clear.

Sincerely,  
Mary A. Bennett  
bennetttrph@aol.com

**From:** [Smith, Ashley](#)  
**To:** [Eichar, Peter](#)  
**Subject:** FW: Harmony Grove Village South comments  
**Date:** Monday, September 28, 2015 2:38:44 PM

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**Ashley Smith**, Land Use/ Environmental Planner  
COUNTY OF SAN DIEGO | Planning & Development Services  
T. 858.495.5375

**\*\*Please note that my email address has changed to [Ashley.Smith2@sdcounty.ca.gov](mailto:Ashley.Smith2@sdcounty.ca.gov) and update your contact information accordingly\*\***

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**From:** mickeykc@juno.com [mailto:mickeykc@juno.com]  
**Sent:** Monday, September 28, 2015 2:35 PM  
**To:** Smith, Ashley  
**Subject:** Harmony Grove Village South comments

Dear Ms. Gungle,

The email address I had for Mr. Eichar (environmental coordinator) apparently isn't valid. Can you forward these comments to him?

The following comments pertain to the above mentioned development and the following PDs, TM, MUP, etc.:

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

It is ridiculous that our community should be continually bombarded by these developments. Having been on the San Dieguito Planning Group for about 4 year some time ago, I reviewed many plans for our community. This has got to one of the worst. The developments that have been built out here, from San Elijo to the first Harmony Grove Village, have and will put so much traffic on our roads...more than our community can deal with. No one wants to acknowledge that traffic will substancially increase on Harmony Grove and Elfin Forest Rds. No one wants to acknowledge that the roads are narrow, full of curves, and one way in each direction. No one wants to acknowledge that we have bike riders on these roads, that even without the developments, pose a serious problem for drivers. No one wants to address the flooding on the roads when we have rain. But yet the county still continues to allow builders to build above what the original density of the property had been approved for. Steep slopes, as you know, require smaller densities (sometimes 1 house per 8, 10 or more acres. We have problems with fires in the area, yet these developers are asking for waivers to fire codes for roads. This area is not suited for cluster developments and we do not want these hillsides leveled.

Why do we even have a community plan if the county does not require the developers to follow it? 453 single and multi family units within 229 structures on 36 acres is dangerous in the Harmony Grove area. 3.5 story multi units buildings are not in harmony with the current type of development in the area. I-15 and Hwy 78 are currently gridlock at peak traffic

hours. The land, from what I understand, is currently zoned limited agricultural and rural residential. When the developer purchased this property, he/she/it/ knew what the zoning on the property was. Therefore, they should only be able to develop as the property is zoned, as should anyone attempting to build out in our area.

This project is not at all in harmony with the majority of the original development in the area. And given the water restrictions that we are under for the state, I RESENT the fact that I am told I must cut back (which I have) on my water use, yet the county, in its infinite LACK OF WISDOM, allows waivers to huge developers so that they can build homes that we do not have the water to supply.

As far as ADTs, 453 homes, if my memory serves me, would generate 4,530 daily ADTs (10 per home). That is just for THIS development. Each commercial establishment could generate 50 ADTs, if I remember correctly. The cumulative impact of this development along with the original Harmony Grove Village and the proposed Valiano project is over the top huge in its impact to our area. If all were approved, the daily ADTs from all of these 3 developments would be over 16,000 daily ADTs. I realize that even if your department recommends denial, the Board of Supervisors could approve it. Hopefully we could recall every one of those who vote in favor of this and other projects. Please recommend denial of this project.

Thank you.

Sincerely

Mary Cross  
7150 Circa de Media  
Elfin Forest, Ca 92029  
760-744-2034



**From:** [midhop@gmail.com](mailto:midhop@gmail.com)  
**To:** [Eichar, Peter](#); [Smith, Ashley](#)  
**Subject:** HGVS NOP comments  
**Date:** Monday, September 28, 2015 4:02:05 PM

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Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003,  
PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

Thank you for the opportunity to comment of the Notice Of Preparation for the EIR of the Harmony Grove Village South project.

Harmony Grove represents a unique planning area where the community attended three County-sponsored workshops and helped to design the Harmony Grove Village project, which included a small, walkable core, a proportion of horse keeping lots, downzoning of the rural periphery, and calculations of the rural-urban balance, all to protect the existing, historic rural neighborhood. This was done under the guidance of the County to preserve the rural lifestyle so that incoming development would not just “push out” the rural residents, as was the usual case.

I hear more and more remarks from existing residents that they will move out of the County if their well-documented wishes to preserve their rural character by surrounding HGV with large lot housekeeping properties is successfully challenged by new development projects that in effect allow the developer to rewrite the community plan in the face of strong opposition from the community. But even more worrisome, I am hearing remarks from friends who live throughout the County, even in urban areas, who feel that if they will not be able to trust the County to uphold their community plans in cases where

the community clearly opposes new projects, they must leave the County.

I am very concerned about the impact of the approval of any GPA that conflicts with the approved community plan, shows no apparent benefit to the local residents, and is strongly opposed by the community. Please study the impacts of the potential erosion of trust of residents County-wide in cases where a GPA is brought forth not by the community nor with the support of the majority of the community, but rather by developer-initiated proposals.

Sincerely,

Mid Hoppenrath

2640 Harmony Heights Road, Harmony Grove

**From:** [Natasha Kay](#)  
**To:** [Smith, Ashley](#); [Eichar, Peter](#)  
**Subject:** Harmony Grove Village South  
**Date:** Monday, September 28, 2015 7:08:23 PM

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Attention: Peter Eichar

County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

I am writing today about the proposed EIR related to the Harmony Grove Village South Project in. We moved here in 2009 from Carlsbad. The reason I, and everyone else I've talked to moved here, is due to the rural atmosphere. We moved here to have quiet, dark night skies, privacy and to be in and around nature.

I am about a half mile around the corner from the Harmony Grove Village and I cannot express how much that project has negatively affected our lives and experience here. It has created noise, lights, more traffic and completely changed Harmony Grove for the worst, in more ways than I will mention here.

The reason for my letter today is to express my concern about the proposed HGVS project. I think that almost everything mentioned in the report would have a very significant negative impact on this community. Everything from vector control, historical land use, wildfire hazards and water have been mentioned and all of these cause us deep concern. The fire death trap that would be created is a huge concern considering what we all just went through last summer. There simply would be no way out for those of us in this valley.

For us (my family here at 9237 Harmony Grove Road) the HGVS project will double (or triple) the negative effects we are already suffering with from the HGV project. The traffic is already going to more than double and if HGVS is approved we may lose our homes due to having to widen the road. We are right on the road and see this as a reality. Being right on the main road we already have almost non-stop traffic day and night which again is only going to be worse once HGV fills up all those homes. With HGVS the traffic will increase even more. The issue of wildlife and open space is one of our largest concerns. Each pair of owls for instance, requires a certain amount of square acres to mate/breed; they will lose even more space. All of the animals will be losing space/habitat and some may die off altogether. When we moved here we had deer and coyotes frequently and now almost never, HGVS will make this even worse. The dark sky policy is another issue

that has been ruined by HGV, and again this project will worsen with this as well. Water is now a huge issue for all of us and I just don't see how hundreds more homes could be responsible much less sustainable. The noise and nuisance is also a factor, as we are directly across the creek from where this project would go, it would be unbearable. We would likely move away.

In conclusion I would just like to express my sadness and anger about the idea of another development down here in Harmony Grove when we haven't even seen the effects of HGV. Another "project" (HGVS) will only exacerbate all of the issues we are now coming to terms with and learning to deal with, not to mention trap us in the event of the Next fire.

Thank you for your consideration,

Natasha Kay (and family)

**From:** [scalpedlr@aol.com](mailto:scalpedlr@aol.com)  
**To:** [Eichar, Peter](#)  
**Cc:** [gevans@alpinemc.com](mailto:gevans@alpinemc.com)  
**Subject:** Harmony Grove Planning  
**Date:** Monday, September 28, 2015 3:41:58 PM

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Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600,  
PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

Thank you for the opportunity to comment on the Notice Of Preparation for the EIR of the Harmony Grove Village South project.

Include your concerns, Biological, Cultural, Traffic, Public Health and Safety, Fire, Aesthetics, Agricultural, Land Use, Cumulative impacts etc.

Nick Evans (Evans family trust) 2925 Cordrey Dr. Escondido, Ca. 92029  
(714) 396-5548  
[Scalpedlr@aol.com](mailto:Scalpedlr@aol.com)



**HARMONY GROVE VILLAGE SOUTH**  
**PROJECT NO.: PDS2015-GPA-15-002, PDS2015-SP-15-002,**  
**PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008**  
**ENVIRONMENTAL LOG NO.: PDS2015-ER-15-08-006**  
**ENVIRONMENTAL IMPACT REPORT (EIR)**  
**NOTICE OF PREPARATION (NOP)**  
**AUGUST 27, 2015 – SEPTEMBER 28, 2015**

**EIR NOTICE OF PREPARATION COMMENT SHEET**

Community NOP Scoping Meeting  
Wednesday, September 16, 2015  
Elfin Forest Firehouse  
20223 Elfin Forest Road  
Elfin Forest, CA 92029

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**WRITTEN COMMENT FORM**

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The Traffic review for this development needs to include not only normal commute traffic but also daily school related trips. The proposed number of homes in Harmony Grove Village South, when added to those of Harmony Grove Village and the proposed number for Valiano in nearby Eden Valley, raises the new total in Harmony Grove/Eden Valley to over 1500. With an estimated two children per household, that would be over 3000 additional children living in this area over and above those already there. There are no schools in the Harmony Grove/Eden Valley area and, to date, there has been no requirement that the builders either build any schools or set aside any land for schools.

The school district serving this area only provides transportation for students with special needs. There is no busing for the general school population. There is also no public transportation in this area. Individual families providing transportation for their children to their respective schools will substantially increase the daily trip average. Low income families without adequate transportation options may have an especially difficult time getting their children to distant schools.

(Attach additional pages as needed)

**MAIL, FAX or E-MAIL FORMS TO:**

Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
FAX #: (858) 694-3373  
e-mail: [peter.eichar@sdcounty.ca.gov](mailto:peter.eichar@sdcounty.ca.gov)

  
Signature \_\_\_\_\_ Date 9/28/15  
NANCY GOODRICH  
Print Name \_\_\_\_\_  
20057 ELFIN FOREST RD  
Address \_\_\_\_\_  
ELFIN FOREST CA 92029  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
760 473-5893  
Phone Number \_\_\_\_\_

**COMMENTS MUST BE RECEIVED BY 4:00 PM, SEPTEMBER 28, 2015**

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## **Gungle, Ashley**

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**From:** Nancy Henderson <nancy4art@sbcglobal.net>  
**Sent:** Wednesday, September 16, 2015 8:48 PM  
**To:** Eichar, Peter; Gungle, Ashley  
**Subject:** Oppose the New development HGVS please...

Attention: Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

**Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-<sup>TM</sup>-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS**

Dear Mr. Eichar and Ms Gungle--

Thank you for the opportunity to comment of the Notice Of Preparation for the EIR of the Harmony Grove Village South project.

As a resident of the Harmony Grove extended community who survived the devastating fire of 2014-- I can tell you our community can not support the addition of this new development due to fire egress issues, public safety, overcrowding of already unsafe and inadequate roadways, lack of proper water and sewage resources, and many other reasons-- quality of life.

Please oppose ALL development in this area--- you are putting our lives at risk by doing so!

Sincerely,

**Nancy C Henderson, MFA**  
PMB 137, POB 5005  
Rancho Santa Fe, CA 92067  
website:NancyCHenderson.com

9-28-15

Dear Mr.Eichar and Ashley Gungle,

Please excuse the long form of this letter.

I feel it's necessary to give you some fairly recent history of San Diego County,in order for you to really appreciate the magnitude of your position and decissions regarding the NOP known as Harmony Grove Village South.

Much of the history below is as recent as the 1980s.

I remember the days when San Diego was the jewel of the southland. No resemblance to Los Angeles.

In those days, members of the Board of Supervisors, San Diego City council members and the like,were very much afraid that San Diego and the surrounding county could become a smaller version of Los Angeles.

Citizens of those days hated LA with it's urban sprawl,strip malls and terrible freeways,as much as we hated the Dodgers and Rams.

Developement was restricted in many ways and developers cried for a change in rules.They won influence and eventually restrictions were lifted.

What's left in San Diego County today is a version much like Los Angeles.

The San Diego environment didn't get much consideration in those days.

There was lots of open space and wildlife.

It seemed plentiful and would last forever.

An example of little environmental concern back then is the wetlands.

They weren't considered valuable and were deystroyed.

Examples are Mission Bay where the Navy was allowed to dump toxic waste. It was then back filled and made into a public park.

Again in South Bay where the shipping industry "Rohr" did the same, Del Mar Race Track , Encinitas lagoons. Those wet lands were back filled and built upon, in spite of the huge, diverse number of birds and animals. Our wetlands actually held the world record for the most species of birds spotted at one time, in 1 hour.

Today we understand how vital the wetlands are as fish nurseries and feeding grounds for birds that only survive there, as well as migratory rest areas for others.

They also serve as controls for coastal flooding taht wasn't understood back then.

Even in the heart of City Heights where I spent my early years, formerly East San Diego.

We could walk to South Bay, Encanto,Mission Valley and all the way to Ocean Beach.

All on open space and canyon lands teeming with wild life,creeks,and the San Diego River.

Later I lived in La Mesa where I could ride my dirt bike all over where the houses, apartment buildings and trolley are now. I could ride to Casa De Oro and Spring Valley and almost to San Diego El Cajon Blvd.

I moved to East County El Cajon. I rode my dirt bike to the head waters of the San Diego river to go fishing. I rode to the sand Pits in Santee where the river flowed through and kids spent the summer in open space with a river to play in. I rode to Miramar with hundreds of acres of open space all with canyons and creeks. Also to Spring valley, never touching a city street while riding to any of these places. Every single route I just mentioned has been developed. Not in a good way either.

All of it was built with little planning for the wildlife corridors that could have sustained the way things were.

It's very unfortunate because San Diego is a very unique animal habitat.

The biodiversity here was unlike anywhere else in the world.

We have killed off huge numbers of different types of animals and habitat. None of the corridors I mentioned are open any longer.

For reference, you can look up Lucy the beloved white deer of Mission Valley.

The point is, there is very little open space left due to mismanagement.

Because development is just reaching North County in a big way, you have the chance to stop more destruction. Save what's left for future generations. Force growth



to areas where the damage can not be undone.

Harmony Grove Village took 400 acres of corridor and uninterrupted water shed. The wild life was slaughtered on the road once development started.

Much of it was pushed onto my land as well as the Highlands Preserve. There was chaos and death for many months while the new animal density settled in.

If not for the valley corridor that is now threatened by Kovacks development of Harmony Grove Village South, that wildlife would have nowhere to go. No way of escape.

That valley is rich with threatened animals and Gnat Catchers and birds of prey.

They can't all move to the preserve as it already is to it's limit because of the Harmony Grove Village project.

We even are home to a neighborhood Mtn. Lion. It must travel to exist.

Stop the madness of high density homes in our rural area.

We have taken our more than fair share of homes to protect what's left.

The agreement of the general plan for Harmony Grove Village got amended to a much higher density than we agreed to take.

Now Kovacks wants to do an even more outrageous density with no way to way to escape the many fires that are prone in this area.

To make a secondary access means more mutilation of habitat in the very last corridor that is contiguous of the highland valley preserve and Elfin Forest

preserve.

I have lived there since 1987. I have been trapped there by traffic during fires when there were only a few houses.

Harmony Grove Rd. was built for a couple hundred cars a week.

After San Elijo was built it increased to 5000 a day.

It's a slaughter house now and head on collisions are common.

Now that Harmony Grove Village is going in, it will increase to 7000 or more a day.

If you allow the proposed density of 452 homes at HGV south, the traffic will be 8000 or more per day.

What gall to ask us to take on that much traffic.

All so some developer can cash a fat check while ruining our way of life. At the same time creating a death trap for us all.

I also have the Escondido Creek that crosses my property. When it floods I do not have access to my home.

No planners have considered the impact it causes me.

Escondido planners forced all the runoff of the city right into my front yard.

The board of supervisors allowed Harmony Grove village to do the same with huge impact on my property.

Now when we get a half inch of rain my property and bridge floods out because all the water is directed to my house.

If HGV South goes in at the proposed density, my property and access to it, will flood at a quarter inch of rain.

Please stop this project. It is killing everything special about this area and cuasing me harm to my property.

I'm afraid to let my kids drive or stay home alone due to the entrapment issues presented by these new developments. Please help us!

Sincerely,

Patrick Molenaar

9115 Harmony Grove Rd.

Escondido, CA 92029

**From:** [Smith, Ashley](#)  
**To:** [Eichar, Peter](#)  
**Subject:** FW: Harmony Grove proposed development  
**Date:** Monday, September 28, 2015 2:04:37 PM

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**Ashley Smith**, Land Use/ Environmental Planner  
COUNTY OF SAN DIEGO | Planning & Development Services  
T. 858.495.5375

**\*\*Please note that my email address has changed to [Ashley.Smith2@sdcounty.ca.gov](mailto:Ashley.Smith2@sdcounty.ca.gov) and update your contact information accordingly\*\***

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**From:** maynardg [mailto:maynardg@earthlink.net]  
**Sent:** Monday, September 28, 2015 2:01 PM  
**To:** Smith, Ashley  
**Subject:** Harmony Grove proposed development

This project does not comply with the general plan. It would create high density housing that would have access through Elfin Forest Road which is only 2 lanes. I believe it to be a fire hazard to have this high density housing and a huge detriment to this community. Please Deny this request for the increased density.  
Randy smith 760 535 6649

Happy Connecting. Sent from my Sprint Samsung Galaxy S® 5

**POSTAL ANNEX**  
BUSINESS CENTER

**Postal Annex #15002**

162 S. Rancho Santa Fe Road, Suite E70  
Encinitas, CA 92024

Date: 9-28-15

Fax Number: (858) 694-3373

To: Peter Eichor / County of SD

From: Susanne Desai resident 7030 Elfin Oaks

Regarding: Harmony Grove Village South

Number of Pages: \_\_\_\_\_

Remarks: Thanks for taking into concern my  
problems with The county approving Harmony  
Grove Village South.

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\_\_\_\_\_

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**HARMONY GROVE VILLAGE SOUTH  
PROJECT NO.: PDS2015-GPA-15-002, PDS2015-SP-15-002,  
PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008  
ENVIRONMENTAL LOG NO.: PDS2015-ER-15-08-006  
ENVIRONMENTAL IMPACT REPORT (EIR)  
NOTICE OF PREPARATION (NOP)  
AUGUST 27, 2015 – SEPTEMBER 28, 2015**

**EIR NOTICE OF PREPARATION COMMENT SHEET**

Community NOP Scoping Meeting  
Wednesday, September 16, 2015  
Elfin Forest Firehouse  
20223 Elfin Forest Road  
Elfin Forest, CA 92029

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**WRITTEN COMMENT FORM**

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*TO Peter Eichar & Whom it may concern,  
I would like to comment and object to the  
County changing the General Plan and allowing  
Harmony Grove Village South to proceed for approval.  
Briefly here are my concerns:  
① Fire emergency infrastructure problems  
I evacuated my 2 horses and 1 goat last May 2014.*

(Attach additional pages as needed)

**MAIL, FAX or E-MAIL FORMS TO:**

Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
FAX #: (858) 694-3373  
e-mail: [peter.eichar@sdcounty.ca.gov](mailto:peter.eichar@sdcounty.ca.gov)

*Susanne Desai 9/28/15*  
Signature Date

*Susanne Desai*  
Print Name

*7030 Elfin Oaks Rd.*  
Address

*Elfin Forest CA 92029*  
City State Zip Code

*(760) 471-5363*  
Phone Number

**COMMENTS MUST BE RECEIVED BY 4:00 PM, SEPTEMBER 28, 2015**



### ① Fire safety:

Evacuating the animals we barely got out of here bc SEH was clogged. I moved traffic pillars to pass with my trailer and then decided to go out towards Escondido. We passed by flames. If Harmony Grove Village being built was evacuating at the same time it would of been a disaster.

We can barely get fire property insurance and this affects our property value. We bought in 2009 our 5 acres (4.6) and it was listed for \$1.8 million. many properties are not selling in Elfin Forest due to fire risk.

② Traffic: The traffic on Elfin Forest Road is already impacted by growth of the approved Harmony Grove Village. We are seeing people passing illegally and going regularly 30 miles per hour faster than the posted 50mph speed limit on Elfin Forest Rd. This increase in speed and traffic has made my property unsafe to use for riding my 2 horses. I have witnessed many accidents on the road and road noise affects the animals we are trying to protect in Sage Hills Reserve across the street. I don't think Elfin Oaks Rd and Firman del Este were built to end on ~~the~~ such a busy road.

③ Impact on wildlife: Our neighborhood is valued by quiet and wildlife such as endangered species who are impacted by noise.

**From:** [Susan Mann](#)  
**To:** [Eichar, Peter](#)  
**Subject:** Dear sir:  
**Date:** Wednesday, September 30, 2015 8:07:42 AM

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I have attempted several times to FAX my comment sheet EIR for the Harmony Grove Village South project to your office at 858-694-3373. My FAX's were unsuccessful. Although I have now missed the 09-28-2015 deadline because of FAX delays, I'm requesting you accept my submission below at this time.

I have personal experience in a fire emergency in the Harmony Grove community. In 2014, the San Marcos fire took an unexpected turn, leaving this area only one escape in and out during the disaster. I have a horse in this historical equestrian area and the new Harmony Grove Village currently under construction will add more horses to the area. During any emergency the proposed "bridge" will be completely inadequate for residents, cars, trailers due to the fact that this one road will likely be closed to our properties. One escape road is an unsafe and poor plan for this special area. I hope you can take these ideas in consideration for planning & limiting the current plan for building the Harmony Grove South project.

Thank you for your consideration,

Susan Mann  
14451 Yazoo Street  
San Diego, CA 92129  
858-231-9170

**HARMONY GROVE VILLAGE SOUTH**  
**PROJECT NO.: PDS2015-GPA-15-002, PDS2015-SP-15-002,**  
**PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008**  
**ENVIRONMENTAL LOG NO.: PDS2015-ER-15-08-006**  
**ENVIRONMENTAL IMPACT REPORT (EIR)**  
**NOTICE OF PREPARATION (NOP)**  
**AUGUST 27, 2015 – SEPTEMBER 28, 2015**

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Elfin Forest, CA 92029

**WRITTEN COMMENT FORM**

#1 Please consider actual evacuation times vs. theoretical times predicted by the Fire emergency plan by asking local residents or their actual experience. There may be other resources, but measurable data vs model. I am concerned the county model may have inaccurate assumptions about traffic flow in Actual emergency conditions, such as what happened in 2014.

Analyze the E/W traffic pattern with the connections of Harmony Grove and Citracado Parkway - current opening has recently changed traffic flow.  
(Attach additional pages as needed)

 9/16/15  
Signature Date

Stacy McChine  
Print Name

20216 Ash Ln  
Address  
Escondido, CA 92029  
City State Zip Code

858-354-3533  
Phone Number

#2 Countywide EIR in 2010 does not properly reflect the impact to the community. The idea of increasing ~~that~~ density must be denied as a destruction of community character. There are more development in the valley coming up.

Peter Eichar  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
FAX #: (858) 694-3373  
e-mail: [peter.eichar@sdcounty.ca.gov](mailto:peter.eichar@sdcounty.ca.gov)

COMMENTS MUST BE RECEIVED BY 4:00 PM, SEPTEMBER 28, 2015

E/w corridor  
↳ Roads impacted - private roads  
Fortuna del Sur

School impact B-c unified  
San El

Promise of how I plan

up zone 2010

Riparian area Storm

w/ englewood oaks

+ ??

goes down properties

check dams  
slow flows

Fire Emergency Plan

actual vs theoretical



**From:** [Scott Sutherland](#)  
**To:** [Smith, Ashley](#); [Eichar, Peter](#)  
**Subject:** Comments Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS NOP  
**Date:** Monday, September 28, 2015 3:33:15 PM

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Ashley and Peter,

Thank you for the opportunity to comment on the Harmony Grove Village South NOP. My wife and I reside in Elfin Forest and we attended the meeting you hosted on September 26<sup>th</sup> in Elfin Forest and the San Dieguito Planning Group meeting last week. We were encouraged to hear so many valuable observations and comments made by community members at both meetings regarding project impacts such as leap-frogging, high density, wildfire evacuation safety, ingress/egress inadequacy, road congestion and pollution. No doubt you will be receiving these comments in formal written form from the many committed members of this community.

I have one comment to make which I think may not be covered by others. That is, the traffic study *must* include the cumulative impacts of all area projects on Elfin Forest/Harmony Grove Road all the way to the intersection at San Elijo Road and beyond. The traffic study is required to address cumulative impacts of other nearby projects, which will include Valiano and Harmony Grove Village, and the total peak traffic flow will certainly exceed the road study threshold of 25. Please note that the Valiano traffic study modeled a peak traffic flow on the road of 23 vehicles, just two below the compulsory road study threshold of 25. Since the HGVS project envisions more dwelling units than Valiano, the peak flow traffic on Elfin Forest/Harmony Grove Road attributable to the project will be similar to, if not more than, Valiano and will certainly exceed the road study threshold. Therefore, the HGVS traffic study must address impacts for the entirety of Elfin Forest/Harmony Grove Road.

Best regards,

Scott Sutherland  
20510 Elfin Forest Road  
Elfin Forest, CA 92029