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

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.

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