

HARMONY GROVE VILLAGE SOUTH

APPENDIX A

NOTICE OF PREPARATION (NOP) AND COMMENTS ON THE NOP

for the

FINAL ENVIRONMENTAL IMPACT REPORT

PDS2015-GPA-15-002

PDS2015-SP-15-002

PDS-REZ-15-003

PDS2018-TM-5626

PDS2015-MUP-15-008

Log No.: PDS2015-ER-15-08-006

JULY 2018

Prepared for:

COUNTY OF SAN DIEGO
PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310
SAN DIEGO, CALIFORNIA 92123



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NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

August 27, 2015

NOTICE IS HEREBY GIVEN that the County of San Diego, Planning & Development Services, will be the Lead Agency and will prepare an Environmental Impact Report in accordance with the California Environmental Quality Act for the following project. The Department is seeking public and agency input on the scope and content of the environmental information to be contained in the Environmental Impact Report. The Notice of Preparation documentation can be viewed at: http://www.sandiegocounty.gov/content/sdc/pds/Current_Projects/hgvs.html; the Planning & Development Services (PDS), Project Processing Counter, 5510 Overland Avenue, Suite 110, San Diego, California 92123; and the public library listed below. Comments on the Notice of Preparation document must be sent to the PDS address listed above and should reference the project number and name.

HARMONY GROVE VILLAGE SOUTH; PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, Environmental Log No.: PDS2015-ER-15-08-006. The project site is located in the southeast quadrant of Harmony Grove Road and Country Club Drive, in the San Dieguito Community Planning Area, between the City of Escondido and the community of Elfin Forest, in the unincorporated area of San Diego County.

The application consists of six discretionary actions: An Resource Protection Ordinance Waiver Request to waive the steep slope open space easement requirement; a General Plan Amendment to change the existing Land Use Designation from Semi-Rural 0.5 (SR-0.5) to Semi-Rural 0.5 (SR 0.5) and Village Residential 10.9 (VR 10.9); a Rezone to reclassify the existing use regulation from A70 (Limited Agriculture) and RR (Rural Residential) to Specific Plan (S88); a Tentative Map and Site Plan to subdivide the project site and demonstrate compliance with the to be adopted Specific Plan; and a Major Use Permit to construct an on-site waste water treatment facility. The applicant proposes to develop 453 single- and multi-family residential units within 229 structures and a 5,000 square foot facility that will support recreation and community uses in addition to commercial space on 111 acres. A substandard crossing of Escondido Creek on Country Club drive will be improved. A water treatment/water reclamation facility (WTWRF), park/community garden uses, and recreational trail connections to existing and planned trail facilities open to the public are also proposed.

A meeting to discuss the scope of the environmental analysis will be held on September 16, 2015 from 6 p.m. to 7:30 p.m. at the Elfin Forest Firehouse, 20223 Elfin Forest Rd., Elfin Forest, CA 92029, (760) 744-2186.

Comments on this Notice of Preparation document must be received no later than **September 28, 2015** at 4:00 p.m. (a 30 day public review period). This Notice of Preparation can also be reviewed at the San Marcos Branch Library, located at 2 Civic Center Drive, San Marcos, CA 92071. For additional information, please contact Peter Eichar at (858) 495-5524 or by e-mail at Peter.Eichar@sdcounty.ca.gov



County of San Diego

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August 21, 2015

CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Title; Project Number(s); Environmental Log Number:
Harmony Grove Village South; PDS2015-GPA-15-002, PDS2015-SP-15-002,
PDS2015-TM-5600, PDS2015-REZ-15-003, PDS2015-MUP-15-008; PDS2015-ER-15-08-006
2. Lead agency name and address:
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239
3.
 - a. Contact: Peter Eichar, Land Use/Environmental Planner
 - b. Phone number: (858) 495-5524
 - c. E-mail: Peter.Eichar@sdcounty.ca.gov
4. Project location:

The project includes four parcels on approximately 111 acres in the southeast quadrant of Harmony Grove Road and Country Club Drive, abutting Country Club Drive, in the southeastern-most portion of the Harmony Grove Valley area of the San Dieguito Community Planning Area, between the City of Escondido (immediately to the east) and the community of Elfin Forest (over 4 miles to the southwest), within unincorporated San Diego County; two and one-half (2.5) miles from Interstate 15 (I-15), and two and six tenths (2.6) of a mile from State Route 78 (SR-78).

Thomas Guide Coordinates: Page 1129, Grids C6 & 7; D6 & 7

5. Project Applicant name and address:

RCS Harmony Partners, LLC
David Kovach
2305 Historic District Road, Suite 100
San Diego, CA 92106
david@kovachcompanies.com

6. General Plan
Community Plan: San Dieguito
Land Use Designation: Semi-Rural 0.5 (SR-0.5)
Density: 2 du/acre
Floor Area Ratio (FAR) N/A
7. Zoning
Use Regulation: A70 and RR
Minimum Lot Size: 0.5 acre
Special Area Regulation: N/A
8. Description of project

Summary

The project application proposes a General Plan Amendment, RPO (steep slopes) wavier, specific plan, rezone, major use permit and site plan to develop 453 single- and multi-family residential units within 229 structures and a 5,000 square foot facility (the Center House) that will support recreation and community uses in addition to commercial space on 111 acres. The Center House could accommodate a coffee shop or café as well a small (up to four bed B&B facility) overnight facility. A substandard crossing of Escondido Creek that is subject to flooding will be improved to allow for safe ingress and egress to the subject and surrounding properties. A water treatment/water reclamation facility (WTWRF), park/community garden uses, and recreational trail connections to existing and planned trail facilities open to the public are proposed. The project would result in approximately 36 acres of primarily residential development including streets, and approximately 75 acres of undeveloped uses such as landscaping, gardens or biological open space.

Land Uses

The current Land Use Designation category is Semi-Rural 0.5 (SR-0.5), and the zoning is A70 (Limited Agriculture) and RR (Rural Residential). The applicant proposes a mixed Land Use Designation of Semi-Rural 0.5 (SR 0.5) and Village Residential 10.9 (VR 10.9) and rezoning to Specific Plan (S88). Access would be provided by private roads connecting to Country Club Drive. The project has been designed to maximize open space by clustering development, resulting in the preservation of open space in the southern portion of the property, containing approximately 32 contiguous acres of high quality biological resources. Dedication of biological open space areas would occur prior to grading activities.

Construction

A total of 229 residential structures, roads and pathways and a single multi-purpose building (the Center House), stormwater control and on-site utilities will require earthwork consisting of balanced cut and fill of approximately 850,000 cubic yards of material. Home sites would be graded to reflect the natural topography, where feasible. Sharp or abrupt grade transitions that do not appear natural would be avoided.

Roadways and a continuous network of multi-use trails and pathways would conform to the natural topography, and incorporate curvilinear elements.

The project would be served by an on-site water treatment/water reclamation facility (WTWRF) that, once constructed, could be operated by the San Diego County Sanitation District. Water utilities (both potable and reclaimed water) would be provided by Rincon del Diablo Municipal Water District (Rincon MWD).

The existing at-grade, concrete pavement crossing of Escondido Creek, underlain by culverts and supported by substantial rip-rap, would be removed and replaced with a three-span bridge, in coordination with and complementary to the San Diego County Capital Improvement Program. Conceptual design of the bridge estimates a 250 feet long and approximately 60 feet wide bridge which would accommodate three auto-travel lanes, a 10-foot wide multi-use trail and 5-foot sidewalks on either side. The bridge would be tall enough to accommodate wildlife crossings within the riparian zone while not notably redirecting or impeding 100-year flood flows. Removal of the existing bridge may improve flooding conditions and restore the riparian habitat. The site contains remnants of a prior residential use as well as a cistern that would be removed. A chimney remnant known to the community would be restored and retained in a nearby location on site.

Off-site utility improvements include the installation of potable and reclaimed water line extensions west and/or north of the site in Country Club Drive, including new project sewer line(s), and potentially new sewer lines in County Club Drive and Harmony Grove Road. Circulation improvements between Harmony Grove Road and the bridge over Escondido Creek include the northbound approach of Country Club Drive to Harmony Grove Road with one through lane, one dedicated right-turn lane, and one dedicated left-turn lane in addition to a southbound lane. The project would implement three-lane improvements from the bridge to the southern Project entrance, as well as shoulder and sidewalk on the east side of Country Club Drive along the project frontage. The center lane would simultaneously provide for southbound left turns at the project entrances, and as a through lane for its total length in an emergency situation (e.g., during a major fire event).

Phasing

The project would be implemented in phases, with the first phase focusing on overall on-site mass grading, and is expected to require approximately three months. On-site infrastructure installation during the second phase (roads and utilities) would follow over a period of six months, followed by the third phase to finish grading of lots over an additional three months. Entry planting, Country Club Drive frontage, interior roads and graded slopes would all be planted when finish grading is completed. The final phase would consist of "vertical" development of the project, which is expected to take up to three years, and some residents could be on site during completion of buildout. Off-site infrastructure (utility upgrades) would be initiated during the second phase and would continue through finish grading on site (third phase). Existing bridge demolition and

new bridge construction is expected to take approximately one year and could begin commensurate with the first phase.

Project Design Features

The Project proposes numerous design features that would be implemented to avoid and/or minimize environmental impacts; the Project includes design features related to aesthetics, air quality, biological resources, energy, geologic hazards, greenhouse gases, hazards (including fire protection) and hazardous waste, hydrology/water quality, noise, public services and utilities, and transportation/traffic.

9. Surrounding land uses and setting:

The project site is located in a semi-rural area that is topographically separated from the City of Escondido by Escondido Creek and some hills and knolls, but within only a few minutes of drive time. Escondido Creek is located just north of the project, south of Harmony Grove Road. The project site is surrounded on all sides except to the immediate northwest by a continuing series of hills and canyons. These range from approximately 600 feet above mean sea level (amsl) to a high point of 1,736 feet amsl at the top of Mt. Whitney, located to the west-northwest. Large expanses of natural open space are located southerly of project parcels, associated with Del Dios Highlands Preserve (DDHP) and Elfin Forest Recreational Reserve (EFRR).

In the northwest quadrant of the Harmony Grove Road and Country Club Drive intersection, is the Harmony Grove Village (HGV) project that includes 742 homes, recreational, and commercial development, supported by a Water Reclamation Facility (WRF) located at the northeast corner of Harmony Grove Road and Country Club Drive. Existing residences and fire station are located within the northeast quadrant of the project site.

Surrounding residential development is located on a wide variety of lot sizes; ranging from the smallest at approximately 1,300 square feet (s.f.) in the Harmony Grove Spiritualist Association (HGSA) located approximately 0.25 mile west of the site, to acreage that allows horse-keeping and grazing or agricultural operations such as groves. Denser housing and subdivisions exist approximately 0.5 mile to the east. Lot sizes in this area are much smaller, with approximately eight residences to an acre. Mobile home parks and apartments are also present to the east (within approximately 0.8 mile of the project). Palomar Medical Center is located approximately two miles to the north and Stone Brewery is located approximately one and a half miles to the north as a crow flies. The Escondido Energy and Technology Center (ERTC), an industrial/commercial, employment and services locus, is also located within a mile north-northeast of the project, accessed by Harmony Grove Road. Other commercial uses include the big box uses at Valley Parkway and I-15 and along Auto Park Way.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

<u>Permit Type/Action</u>	<u>Agency</u>
General Plan Amendment (GPA)	County of San Diego
RPO Wavier (steep slopes)	County of San Diego
Habitat Loss Permit (4[d])	County of San Diego
Landscape Plans	County of San Diego
Major Use Permit	County of San Diego
Grading Permit	County of San Diego
Reclamation Plan	County of San Diego
Rezone	County of San Diego
Specific Plan	County of San Diego
Tentative Map	County of San Diego
County Right-of-Way Permits Encroachment Permit	County of San Diego
Grading Permit	County of San Diego
Improvement Plans	County of San Diego
Annexation to a Special District (water, sewer, fire districts, as necessary)	Local Agency Formation Commission (LAFCO)
401 Permit - Water Quality Certification	Regional Water Quality Control Board (RWQCB)
404 Permit – Dredge and Fill	US Army Corps of Engineers (USACE)
1602 – Streambed Alteration Agreement	CA Department of Fish and Wildlife (CDFW)
Section 7 - Consultation or Section 10a Permit – Incidental Take	US Fish and Wildlife Services (USFWS)
Air Quality Permit to Operate – Title V Permit	Air Pollution Control District (APCD)
National Pollutant Discharge Elimination System (NPDES) Permit	RWQCB
General Construction Storm water Permit	RWQCB
Waste Discharge Requirements Permit	RWQCB
Water District Approval	Rincon del Diablo Municipal Water District (Rincon MWD)
Sewer District Approval	County Sanitation District (CSD), Rincon MWD, or other public district as necessary
New or Amended Master Water Reclamation Permit	CSD, Rincon MWD, or other public district as necessary.
Fire District Approval	San Diego County Fire Authority
School District Authorization	Escondido Union School District (EUSD) Escondido Union High School District (EUHSD)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a “Potentially Significant Impact” or a “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| ☒ <u>Aesthetics</u> | ☐ <u>Agriculture and Forest Resources</u> | ☒ <u>Air Quality</u> |
| ☒ <u>Biological Resources</u> | ☒ <u>Cultural Resources</u> | ☒ <u>Geology & Soils</u> |
| ☒ <u>Greenhouse Gas Emissions</u> | ☒ <u>Hazards & Haz. Materials</u> | ☒ <u>Hydrology & Water Quality</u> |
| ☒ <u>Land Use & Planning</u> | ☐ <u>Mineral Resources</u> | ☒ <u>Noise</u> |
| ☒ <u>Population & Housing</u> | ☒ <u>Public Services</u> | ☒ <u>Recreation</u> |
| ☒ <u>Transportation/Traffic</u> | ☒ <u>Utilities & Service Systems</u> | ☒ <u>Mandatory Findings of Significance</u> |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ On the basis of this Initial Study, Planning & Development Services finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, Planning & Development Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



8/21/15

Signature

Date

Peter Eichar
Printed Name

Land Use/Environmental Planner
Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| ☒ | Potentially Significant Impact | ☐ | Less than Significant Impact |
| ☐ | Less Than Significant With Mitigation Incorporated | ☐ | No Impact |

Potentially Significant Impact: The project site is located approximately 200 feet south of Escondido Creek, which is immediately south of Harmony Grove Road. There are several other public vantage points in the vicinity, including the Del Dios Highlands Trail in Del Dios Highlands Preserve, and trails including the "Way Up" trail in Elfin Forest Recreational Reserve. In addition, there are more distant public streets such as Seeforever Drive, which overlooks the Eden and Harmony Grove valleys from the northwest, including the project site.

A Visual Resources Report for the proposed project is being prepared, and full discussion will be provided in the EIR for both direct and cumulative impacts. Based on the results of the visual resources analysis, the project may be required to incorporate avoidance, mitigation or design features to be compatible with the existing visual environment in terms of visual character and quality.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| ☒ | Potentially Significant Impact | ☐ | Less than Significant Impact |
| ☐ | Less Than Significant With Mitigation Incorporated | ☐ | No Impact |

Potentially Significant Impact: The proposed project is not located near or visible within the composite viewshed of a designated State scenic highway and therefore will not damage or remove visual resources within a State scenic highway. The proposed project is, however, located near to a County-identified scenic highway - Harmony Grove Road - that has lateral views onto the project site. The project's potential impacts related to effects on a County scenic corridor will be addressed in the EIR and in the Visual Resources Report for the project.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| ☒ | Potentially Significant Impact | ☐ | Less than Significant Impact |
| ☐ | Less Than Significant With Mitigation Incorporated | ☐ | No Impact |

Potentially Significant Impact: Visual character is the objective composition of the visible landscape within a viewshed. The existing visual character and quality of the project site can be characterized as disturbed, but open and undeveloped.

The project proposes development of 229 structures and associated infrastructure at village densities, requiring approximately 850,000 cubic yards of balanced cut and fill. The proposed change in density and volume of earthwork requires full discussion of the site's existing and future visual character and quality, as well as viewer groups (motorists, residents and recreationalists) and their respective sensitivity and exposure to the site. These will be addressed in the EIR and in the Visual Resources Report for the project. The cumulative effect of the project and others in the vicinity will also be analyzed.

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant Impact: The proposed project will use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code (LPC), approximately 25 miles from the Palomar Observatory. However, it will not adversely affect nighttime views or astronomical observations, because the project will conform to the LPC (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights.

Compliance with the Code is required prior to issuance of any building permit for any project. Compliance with the Code ensures that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

The project's outdoor lighting will be controlled through Site Plan conditions. The potential for new sources of substantial light or glare will be addressed in the EIR and in the Visual Resources Report for the project.

II. AGRICULTURE AND FORESTRY RESOURCES -- Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant Impact: A portion of the project site has land designated as Farmland of Local Importance according to the State Farmland Mapping and Monitoring Program (FMMP). However, based on a site visit and a review of historic aerial photography, as well as a prior agricultural report prepared for the property (RECON 2006), there is no evidence of

agricultural use on the project site for over 65 years. Given the lack of agricultural use on the site within at least the past 65 years, the Farmland of Local Importance designation of this area according to the State is incorrect. The Farmland designation is likely misapplied as a result of the large scale of the Statewide mapping effort which assigns Farmland designations based on aerial photography and limited ground verification. Project parcels do not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Only Farmland of Local Importance and "Other" are present, at approximately 20 and 91 acres, respectively. Therefore, due to the lack of historic agricultural use at the project site, the site does not meet the definition of an agricultural resource and no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use will occur as a result of this project.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: The project site is zoned RR (Rural Residential), and A70 (Limited Agriculture), which is considered to be an agricultural zone. However, the proposed project will not result in a significant conflict in zoning for agricultural use, because the site is designated as Semi-rural Residential 0.5 in the County's General Plan. The project will not create a conflict with existing zoning for agricultural use. Additionally, the project site is not under a Williamson Act Contract. Therefore, there will be no significant conflict with existing zoning for agricultural use, or any conflict with an existing Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: The project site and off-site improvement areas do not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is not located in the vicinity of forest resources. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones.

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
|---|---|

- ☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

No Impact: The project site and off-site improvement areas do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of off-site forest resources.

- e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

- ☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant Impact: The area surrounding the project site has limited agricultural uses (grove trees associated with an estate residential use) within 0.25 mile of the project. The proposed project was determined not to have significant adverse impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance or active agricultural operations associated with those uses to a non-agricultural use for the following reasons:

- Active agricultural operations consisting of avocado and/or citrus orchards commonly operate among residential uses and create minimal land use conflicts due to the nature of the agricultural use; and
- Active agricultural operations are separated from proposed land uses on the project site and by other developed residential parcels

Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use will occur as a result of this project.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- ☒ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Potentially Significant Impact: The current 2009 RAQS (SDAPCD 2009) are based on projections for residential, commercial, industrial and recreational land uses contained in the

County's 1979 General Plan (County 1979), which was in place at the time the RAQS were adopted in 2009. The current General Plan, adopted in 2011, allows more dense residential development for the project site than was planned in 1979 based on apparent land use designations for the parcels of Impact Sensitive and Multiple Rural Use, with associated varying residential densities from one dwelling unit per 4, 8 or 20 acres. The current project involves a GPA and is proposing to increase the total number of residential units from 220 units, as allowed under the current 2011 General Plan Land Use Designation, to 453 dwelling units. Because the project is proposing a more dense development than was planned in 2011, it is correspondingly also proposing an increase of units over that proposed in the 1979 General Plan, and therefore the RAQS. This issue will be addressed in the EIR and in the Air Quality Impact Analysis for the project.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

- | | |
|---|---|
| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: In general, air quality impacts from projects are the result of emissions from motor vehicles, and from short-term construction activities associated with such projects. The San Diego County Land Use Environment Group (LUEG) has established guidelines for determining significance which incorporate the Air Pollution Control District's (SDAPCD) established screening-level criteria for all new source review (NSR) in APCD Rule 20.2. These screening-level criteria can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since APCD does not have screening-level criteria for emissions of volatile organic compounds (VOCs), the use of the screening level for reactive organic compounds (ROC) from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which are more appropriate for the San Diego Air Basin) are used.

The project proposes the construction of an anticipated 229 residential structures (453 total residential units), as well as a recreational/community building, and a WTWRF, which will result in temporary vehicular emissions during construction. Blasting also may be required during the initial phases of construction, resulting in additional emissions of particulate matter. Project construction is anticipated to take for year to complete. Once the project is operational, emissions will result from area sources (such as natural gas fireplaces, landscaping, and maintenance use of architectural coatings), energy sources, mobile sources, and the proposed WTWRF. The vehicle trips generated by the project are projected to total 4,530 Average Daily Trips (ADTs).

Construction and operation of the proposed project could therefore lead to emissions that could violate an air quality standard or contribute substantially to an existing or projected air quality violation. Air emissions from the project will be evaluated through a technical analysis to quantify maximum daily emissions that can be compared to the appropriate screening

level thresholds, and identify mitigation measures, as necessary. These issues will be fully addressed in the EIR and in the Air Quality Impact Analysis for the project.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: San Diego County is presently in non-attainment for the 1-hour and 8-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for Ozone (O₃). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns (PM₁₀) and Particulate Matter less than or equal to 2.5 microns (PM_{2.5}) under the CAAQS. O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Air quality emissions associated with the project include emissions of PM₁₀, NO_x and VOCs from construction/grading activities, as well as increased traffic operations. Grading operations associated with the construction of the project would be subject to County of San Diego Grading Ordinance, which requires the implementation of dust control measures. The vehicle trips generated from the project will result in 4,530 Average Daily Trips (ADTs). These project factors could contribute to adverse air quality conditions in San Diego County, especially considering the non-attainment status of the region for the pollutants noted above. These issues will be addressed in the EIR and in the Air Quality Impact Analysis for the project.

- d) Expose sensitive receptors to substantial pollutant concentrations?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

Sensitive receptors abutting or within a quarter mile of the proposed project include residences to the west and east of the project. There are no schools, hospitals, or other sensitive receptors within this distance of the project site. The project will involve construction over a four-year period, as well as increased traffic once operational. Emissions from construction and operational traffic could result in impacts to nearby sensitive receptors, with a focus on CO and diesel particulate matter.

Additionally, the project will introduce new sensitive receptors into the project area. All these on- and off-site receptors could potentially be exposed to toxic air contaminants in case of accidental release from the potential on-site WTWRF. These issues will be addressed in the EIR and in the Air Quality Impact Analysis for the project.

e) Create objectionable odors affecting a substantial number of people?

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| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: The project could produce objectionable odors, which will result from the proposed on-site WTWRF. Odors are typically associated with particular steps in the wastewater treatment process. Although odor control design will be incorporated into the design of the WTWRF to minimize affects to nearby sensitive receptors or other sensitive receptors, the potential for odor impacts will be addressed in the EIR and in the Air Quality Impact Analysis for the project.

IV. BIOLOGICAL RESOURCES -- Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service?

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|---|---|
| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: Based on 2014 surveys by HELIX Environmental Planning (HELIX) the project site includes the following habitats that contain sensitive plant species and/or support sensitive animal: Diegan coastal sage scrub, coastal sage-chaparral transition, granitic southern mixed chaparral, mafic southern mixed chaparral, coast live oak woodland, and non-native grassland. In addition, where project improvements will cross Escondido Creek, there is southern (willow) riparian forest and mule fat scrub. Species known to use these habitats include California coastal gnatcatcher (Federally listed as Threatened, a State Species of Special Concern, and County Group 1 animal; one pair was seen during 2014 surveys) and least Bell's vireo (Federally listed as Endangered, State listed as Endangered, and a County Group 1 animal; known to forage in Escondido Creek based on 2014 surveys).

Additionally, individuals of summer holly (a County List A plant) and wart-stemmed ceanothus (a County List B plant) are known to be on site. A red-shouldered hawk (County Group 1) was observed perched near Escondido Creek. Yellow breasted chat and yellow warbler, both State Species of Concern and County Group 1 and 2 animals, respectively, were in Escondido Creek riparian habitat. Green heron and great blue heron (County Group 2 species) were observed foraging in Escondido Creek. Spiny rush and ashy spike moss (County Group D plants) were observed.

Based on the fact that the site has the potential to support several endangered, threatened, or rare plant or animal species or their habitats; potentially significant adverse direct and indirect, as well as potential cumulative effects to these endangered, threatened, or rare plant or animal species or their habitats will be addressed in the EIR and in the Biological Technical Report for the project.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: As described in IV(a), the project site contains Diegan coastal sage scrub, coastal sage-chaparral transition, granitic southern mixed chaparral, mafic southern mixed chaparral, coast live oak woodland, and non-native grassland. Each of these habitats could be impacted during project grading and construction activities.

The site contains a number of drainages (ephemeral streambed), that bisect the project site and are ultimately tributaries to Escondido Creek. On-site construction could result in on-site impacts to ephemeral streambed, in addition to coast live oak woodland associated with the ephemeral streambed. Southern (willow) riparian forest and mule fat scrub is located adjacent to the "Arizona" crossing of Escondido Creek. Project-related access construction could also result in off-site impacts to both of these vegetation communities. Altogether, the project could result in impacts to wetlands and/or waters of the U.S. and non-wetland waters of the U.S. subject to USACE jurisdiction; vegetated streambed and unvegetated streambed subject to CDFW jurisdiction; and RPO wetland subject to County jurisdiction. These issues will be fully addressed in the EIR and in the Biological Technical Report for the project.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: Project-related construction could result in impacts to mule fat scrub and southern willow riparian forest associated with the crossing of Escondido Creek. Specifically, this will have to do with grading to re-contour the streambed to a more natural flow (eliminating culverts and portions of rip-rap that currently support an approximately five-foot drop-off between roadbed and creek bed west of the current “Arizona” crossing [resulting from scour associated with culverts]), as well as potential placement of fill. This will result in impacts to wetlands and waters of the U.S. and non-wetland waters of the U.S. subject to USACE jurisdiction. The impacts will be temporary for resident access/egress, equipment maneuvering, and staging during bridge construction. Permanent impacts will be limited to potential bridge abutments, footings, and bank stabilization.

Project-related impacts, therefore, may result in significant alterations to known watersheds or wetlands identified as jurisdictional wetlands or waters by USACE and will require a 404 Permit. USACE jurisdictional waters and potential impacts will be fully addressed in the EIR and in the Biological Technical Report for the project.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☒	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Potentially Significant Impact: In the context of the Draft North County Multiple Species Conservation Program (MSCP) Plan, the study area occurs within lands identified as potential pre-approved mitigation area (PAMA) in the vicinity of core area, outside of any linkage area. With respect to wildlife movement in the region, conservation targets generally include conserving a contiguous riparian corridor in Escondido Creek, and conserving a large core area of upland habitat around DDHP and EFRR. Related to these are conserving regional movement within core area associated with DDHP and EFRR, and conserving access to the Escondido Creek corridor from the core area.

The project could impede wildlife access to on- and off-site areas that may be used for foraging, breeding, or obtaining water. Although wildlife will be expected to have unobstructed access around work areas by moving along the eastern boundary of the project site, through the open space proposed for conservation in the southern portions of the site, and finally to the downstream reach of Escondido Creek further to the west of the site; access along the small reach of Escondido Creek that occurs at the Country Club Drive crossing will be temporarily interrupted during construction. Issues related to corridors and linkages, artificial corridors, adequate visual continuity, indirect effects, etc. on both a project direct and potential cumulative basis will be addressed in the EIR and in the Biological Technical Report for the project.

- e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: The project is being reviewed for consistency with the Natural Communities Conservation Plan (Habitat Loss Permit [HLP] Ordinance and Planning Agreement), Habitat Management Plans (HMPs), Special Area Management Plans (SAMP), and the Resource Protection Ordinance (RPO). The potential for the project to affect future NCCP planning even though it is outside an approved/adopted MSCP area will also be addressed in the EIR and the Biological Technical Report for the project.

V. CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: No standing structures are located on the site, but prior on-site survey and testing of resources in 2006 by RECON identified remnants of an old cistern and residential uses. These remnants of an abandoned farm complex were documented as CA-SDI 18,320. No information was found to associate the site uses with a significant event in California's history or cultural heritage. The owners of the land were known in the Escondido area, but nothing could be found to link them to significant events in Harmony Grove, Escondido, San Diego County, or California's past. Additionally, because none of the structural remains associated with the site was intact and there were no distinctive characteristics associated with those remnants, no valuable information could be discerned regarding the history of the region. If historic buried features are present in the project area, there is a potential that they could provide insight into life during the late Mexican and early American periods in San Diego County. This will be addressed in the EIR and Cultural Resources Technical Report prepared for the project.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: A number of archaeological resources have been identified within a mile radius of the site. No prehistoric archaeological resources were identified during 2006 surveys by RECON or 2014 site surveys by ASM Affiliates Inc. There is, however, a potential for prehistoric archaeological deposits to lie buried below the site alluvium, and/or that the discovery of sites has been hampered by dense vegetation. Therefore, there is potential for grading activities associated with construction of the proposed project to result in the discovery of previously unrecorded, potentially significant archaeological resources; and for the project to cause a substantial adverse change in the significance of those resources. There is a similar potential for prehistoric archaeological deposits to lie buried below the surface in areas identified for off-site project improvements. A significant direct (and possible cumulative) impact is therefore possible, that will be addressed in the EIR and the Cultural Resources Technical Report for the project.

c) Directly or indirectly destroy a unique geologic feature?

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|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

d) Directly or indirectly destroy a unique paleontological resource or site?

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|---|---|
| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: A review of the County's Paleontological Resources Maps indicates that the project is located entirely on plutonic igneous rock (cretaceous-age granitic rocks) with no potential for producing fossil remains, or alluvium/colluvium (with a low, but possible, potential for direct and/or cumulative impacts.) The project area is outside the area identified for paleontological monitoring on the County's Paleontological Resources Potential and Sensitivity Map (County 2009). These issues will be addressed in the project EIR.

e) Disturb any human remains, including those interred outside of formal cemeteries?

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| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: During the current archaeological evaluation, no evidence of human remains, including those interred outside of formal cemeteries, was identified during the records search, literature review, field survey, or site testing and evaluation program. A number of archaeological resources have been identified within a mile radius of the site, however. A grading monitoring program will be included in the mitigation monitoring and reporting program which includes California State law requirements should human remains be identified during ground disturbing activities. For all of these reasons, discovery of human remains is considered unlikely. If, however, human remains were to be unexpectedly unearthed during grading activities, impacts could be significant. This issue will be addressed in the EIR and the Cultural Resources Technical Report for the project.

VI. GEOLOGY AND SOILS -- Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant Impact: No known active or potentially active faults, or associated Alquist-Priolo/County Special Study Zones, are mapped or known to occur within or adjacent to the project site, with the closest active fault located approximately 13 miles to the west along the Newport-Inglewood and Rose Canyon Fault Zone. The closest fault zone designations include an Alquist-Priolo Earthquake Zone approximately 18 miles to the southwest along a section of the Newport-Inglewood and Rose Canyon Fault Zone in La Jolla, while the closest County Special Study Zone is located along the Elsinore Fault Zone approximately 20 miles to the northeast (California Geological Survey 2010, 2007; County 2007). Therefore, there will be no potentially significant impact from the exposure of people or structures to a known fault-rupture hazard zone as a result of this project. This issue will be addressed in the EIR and Geotechnical Report prepared for the project.

- ii. Strong seismic ground shaking?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: Although the project site is not located in a hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, the project site can be subject to ground shaking from seismic activity. To ensure the structural integrity of all buildings and

structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. Therefore, standard engineering and construction practices, and required compliance with the California Building Code and the County Code, will ensure the project will not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking. This issue will be addressed in the EIR and Geotechnical Report prepared for the project.

iii. Seismic-related ground failure, including liquefaction?

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| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards (2007). This indicates that the liquefaction potential at the site is low. It should also be noted, however, that two areas of potentially shallow, seasonal groundwater were identified during site investigation by GEOCON. A number of standard design and construction measures have been identified that will address any associated liquefaction potential in these (or other) areas, including efforts such as installation of subdrains in appropriate areas to avoid near-surface saturation, removal of unsuitable (e.g., compressible) deposits in areas proposed for development, and replacement of unsuitable materials with engineered fill. In addition, these standard remedial efforts associated with liquefaction and related hazards will be verified through plan review and site-specific geotechnical observations and testing during project excavation, grading, and construction activities. Implementation of standard engineering and construction practices, as well as conformance with applicable regulatory/industry standards, will avoid or reduce potential project-related impacts associated with seismically induced liquefaction and related hazards to less than significant levels. This issue will be addressed in the EIR and Geotechnical Report prepared for the project.

iv. Landslides?

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| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: The project site is not within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within

Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone. Since the project is not located within an identified Landslide Susceptibility Area and the geologic environment has a low probability to become unstable, the project will have a less than significant impact from the exposure of people or structures to potential adverse effects from landslides. Additionally, implementation of standard engineering and construction practices, as well as conformance with applicable regulatory/industry standards and use of drought-tolerant landscaping and irrigation controls, will additionally avoid or reduce potential project-related impacts to less than significant levels. This issue will be addressed in the EIR and Geotechnical Report prepared for the project.

b) Result in substantial soil erosion or the loss of topsoil?

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| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: According to the Natural Resources Conservation Service (NRCS 2007, 1973), the soils on-site are identified as Cieneba, Escondido, Huerhuero, Las Posas, Visalia, and Wyman. These soil types have soil erodibility ratings ranging from “low” to “high.” In general, the project will not result in substantial soil erosion or the loss of topsoil because, the project is required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING). Compliance with these regulations minimizes the potential for water and wind erosion.

It is understood, however, that while graded, excavated and filled areas associated with construction activities will be stabilized through efforts such as compaction and installation of hardscape and landscaping, erosion potential will be higher in the short-term than for existing conditions. Developed areas will be especially susceptible to erosion between the beginning of grading/construction and the installation of pavement or establishment of permanent cover in landscaped areas. While erosion and sedimentation are not considered to be significant long-term concerns for the proposed project because developed areas will be stabilized through installation of hardscape or landscaping, and the project will incorporate long-term water quality controls pursuant to County and NPDES guidelines, including measures that will avoid or reduce off-site sediment transport through use of detention/water quality basins, energy dissipators, irrigation controls and drainage facility maintenance (i.e., to remove accumulated sediment), the short-term water quality effects from project-related erosion and sedimentation could potentially affect downstream waters and associated wildlife habitats, with such impacts considered potentially significant. These issues will be addressed in the EIR and Storm Water Management Plan prepared for the project. Erosion and sedimentation controls implemented for the project will be further defined during the NPDES/County Storm Water Pollution Prevention Plan process, with the resulting BMPs taking priority over the more general types of standard industry measures.

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less than Significant Impact: The proposed project involves 850,000 cubic yards of grading that would result in the creation of areas of cut and areas underlain by fill. In order to assure that any proposed buildings are adequately supported a Soils Engineering Report is required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a Building Permit. With this standard requirement, impacts would be less than significant. This issue will be addressed in the EIR and Geotechnical Report prepared for the project.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: Expansive (or shrink-swell) behavior in soils is attributable to the water-holding capacity of clay minerals, and can adversely affect the integrity of facilities such as foundations, pavement and underground utilities. On-site conditions from very low expansive silty sands, to potentially highly expansive topsoil, alluvium and/or colluvium containing clay materials. Accordingly, a number of standard measures will be required to address potential expansion impacts. Specifically, these include efforts such as: (1) removing and replacing expansive soils with engineered fill exhibiting very low or low expansion potential (per IBC/CBC or other applicable regulatory/industry criteria); (2) use of appropriate foundation design (including post-tensioned slabs), reinforcement and footing depths; (3) implementation of appropriate concrete placement methodology and design, including proper installation/curing and moisture conditioning, doweling (anchoring) of exterior flatwork and driveways to building foundations, and use of crack-control joints; and (4) use of subdrains in appropriate areas to avoid near-surface saturation. These standard recommendations will be verified through plan review and site-specific geotechnical observations and testing during project excavation, grading and construction activities. Implementation of such design and construction recommendations, as well as conformance with applicable County, IBC/CBC, Greenbook or other pertinent guidelines (e.g., improvement requirements identified in the 1997 Uniform Building Code, Division III – Design Standard for Design of Slab-On-Ground Foundations to Resist the Effects of Expansive Soils and Compressible Soils), will ensure suitable structure safety in areas with expansive soils. Therefore, these soils will not create

substantial risks to life or property. This issue will be addressed in the EIR and Geotechnical Report prepared for the project.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The project will include either an on-site WTWRF or connection to an adjacent WTWRF (located within 550 feet of the project) to serve the project needs. No septic tanks or alternative wastewater disposal systems are proposed.

VII. GREENHOUSE GAS EMISSIONS -- Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact:

GHGs include carbon dioxide, methane, halocarbons (HFCs), and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources. A regional GHG inventory prepared for the San Diego Region¹ identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions in the region, accounting for 46% of the total regional emissions. Electricity and natural gas combustion were the second (25%) and third (9%) largest regional contributors, respectively, to regional GHG emissions.

In the County's guidance document, *Recommended Approach to Addressing Climate Change in CEQA Documents* (January 2015), the County recommends using a 900 MT of CO₂e per year screening threshold. The size of a typical single-family residential project that would exceed that threshold is 50 units. Because the proposed project consists of 453 units, the project will potentially exceed the County's threshold. These issues will be explored in the EIR and the Greenhouse Gas Analyses Report prepared for the project.

- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

¹ San Diego County Greenhouse Gas Inventory: An Analysis of Regional Emissions and Strategies to Achieve AB 32 Targets. University of San Diego and the Energy Policy Initiatives Center (EPIC), September 2008.

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| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: The County of San Diego's General Plan incorporates various climate change goals and policies. These policies provide direction for individual development projects to reduce GHG emissions.

The project is above the County of San Diego recommended screening criterion for single-family housing developments and could have a cumulatively considerable impact with regard to GHG emissions. Development projects that could have cumulatively considerable GHG emission need to meet Performance Thresholds to reduce emissions from "business as usual" by a minimum of 16 percent in order to not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. These issues will be addressed in the EIR and Greenhouse Gas Analyses Report prepared for the project.

VIII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

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| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: The project proposes a Wastewater Treatment/Water Reclamation Facility (WTWRF) which could require the routine use and storage of hazardous materials. However, the project will not result in a significant hazard to the public or environment because all storage, handling, transport, emission and disposal of hazardous substances will be in full compliance with local, State, and Federal regulations. California Government Code § 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520.

The San Diego County Department of Environmental Health Hazardous Materials Division (DEH HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEH HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity and health risks of hazardous materials stored, used, or disposed of onsite. The plan also contains an emergency response plan which describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential

damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local Fire Agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

Therefore, due to the strict requirements that regulate hazardous substances outlined above and the fact that the initial planning, ongoing monitoring, and inspections will occur in compliance with local, State, and Federal regulation; the project will not result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances. This will be addressed in the EIR and the Phase I Environmental Site Assessment prepared for the project.

- b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The project is not located within one-quarter mile of an existing or proposed school. Therefore, the project will not have any effect on an existing or proposed school.

- c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less than Significant Impact: Based on a site visit and regulatory database search, the project site has not been subject to a release of hazardous substances. The project site is not included in any of the following lists or databases: the Federal RCRA-Small Quantity Generators (SQG) list, State Spills, Leaks, Investigations and Cleanup (SLIC Program), Historical Underground Storage Tank (Hist UST) Regulatory Database, Statewide Environmental Evaluation and Planning System (SWEEPS) UST Database, or the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database). Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as

containing burn ash (from the historic burning of trash), is not on or within 1,000 feet of a Formerly Used Defense Site (FUDS), and is not known to be located on a site with the potential for contamination from historic uses such as intensive agriculture, industrial uses, a gas station or vehicle repair shop. Therefore, the project is not known to create a significant hazard to the public or environment. This will be addressed in the EIR and the Phase I Environmental Site Assessment prepared for the project.

- d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project will not constitute a safety hazard for people residing or working in the project area.

- e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The proposed project is not within one mile of a private airstrip. As a result, the project will not constitute a safety hazard for people residing or working in the project area.

- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

- i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

Less Than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY
RESPONSE PLAN:

No Impact: The San Diego County Nuclear Power Station Emergency Response Plan will not be interfered with by the project due to the location of the project, plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Oil Spill Contingency Element will not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE
RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan will not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

No Impact: The Dam Evacuation Plan will not be interfered with because the project is not located within a dam inundation zone.

- g) 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?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation	☐ No Impact

Incorporated

Potentially Significant Impact: The proposed project is adjacent to wildlands that have the potential to support wildland fires. The project is, however, subject to strict regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code designed to lower exposure of people or structures to a significant risk of loss, injury or death involving wildland fires.

The Maximum Travel Time allowed for the project's proposed land use designation pursuant to the County Safety Element is five minutes. Fire Service will be provided by the new fire station approved as part of the Harmony Grove Village project. This fire station will be less than 1.3 miles from the site, with an estimated travel time of less than three minutes to the most distant on-site structure. Confirmation of this time, as well as details regarding limited building zones, fuel management, street turn radii, water pressure and fire hydrant locations, building standards, etc. will be addressed in the EIR and Fire Protection Plan provided for the project.

- h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

☒	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation	☐	No Impact

Incorporated

Potentially Significant Impact: The project proposes an on-site WTWRF. This type of facility has been associated with attracting vectors, and may contribute to a cumulative issue given the proximity of the Harmony Grove facility within 550 feet. This issue will be addressed in the EIR and Sewer Master Plan prepared for the project.

IX. HYDROLOGY AND WATER QUALITY -- Would the project:

- a) Violate any waste discharge requirements?

☒	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation	☐	No Impact

Incorporated

Potentially Significant Impact: The project would include grading in order to support site development and would include potential implementation of a WTWRF or specific elements thereof. It is required to comply with all waste discharge requirements; however, additional analysis is required to demonstrate compliance. A discussion of special site design considerations, source control Best Management Practices (BMPs) and treatment control BMPs, under the San Diego Municipal Storm Water Permit (SDRWQCB Order No. R9-2007-0001) as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP), and

compliance with any other waste discharge requirements will be discussed as a part of the EIR, Storm Water Management Plan (SWMP) and CEQA Preliminary Hydrology/Drainage Study, (Hydrology/Drainage Study) prepared for the project, as appropriate.

- b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

- | | |
|--|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☒ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant With Mitigation Incorporated: The project lies in the Escondido Creek hydrologic area (HA) and the Escondido hydrologic subarea (HSA), within the Carlsbad hydrologic unit - that is impaired for Coliform bacteria, nutrients, heavy metals, and pesticides. The project could result in an increase of pollutants for which the water body is already impaired through sedimentation into downstream waters during construction. Construction-related hazardous materials could also be subject to accidental release which could potentially result in significant impacts if pollutants reach downstream receiving waters (particularly petroleum compounds that are potentially toxic to aquatic species in low concentrations). Disposal of any extracted shallow groundwater into local drainages could also result in an increase in impacts related to the occurrence of potential pollutants in local groundwater aquifers. Long-term operation and maintenance impacts could result from project trash and debris, oil and grease, bacteria, pesticide use, etc. Construction BMPs and controls, as well as LID/Site design BMPs (to avoid, minimize and/or control post-development runoff, erosion potential and pollutants generation by mimicking the natural hydrologic regime) and source control BMPs (to avoid or minimize the introduction of pollutants into storm drains and natural drainages) as well as LID and treatment control BMPs (to remove pollutants from urban runoff from a storm event through filtering, treatment or infiltration), as well as monitoring/maintenance BMPs will all be incorporated into the project. The applicant will be required to design the project to meet the performance standards of the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) for flow control and erosion, and surface and ground water quality. These issues will all be addressed in the EIR, SWMP, Hydrology/Drainage Study prepared for the project, as well as the NPDES/County SWPPP process, and NPDES Groundwater and Municipal Permits, as appropriate.

- c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

- | | |
|---|---|
| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: The Regional Water Quality Control Board has designated water quality objectives for waters of the San Diego Region to protect the existing and potential beneficial uses of each hydrologic unit. The project lies in the Escondido Creek HA and the

Escondido HSA, within the Carlsbad hydrologic unit that has the following existing and potential beneficial uses for inland surface waters, coastal waters, reservoirs and lakes, and ground water: municipal and domestic supply; agricultural supply; industrial service supply; hydropower generation; contact water recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; wildlife habitat; commercial and sport fishing; aquaculture; estuarine habitat; marine habitat; migration of aquatic organisms; shellfish harvesting; and, rare, threatened, or endangered species habitat.

The project will include a number of required features that would minimize project-related runoff that would cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives. Applicable surface or groundwater water quality objectives and project controls will be addressed in the EIR, SWMP, Hydrology/Drainage Study prepared for the project, as well as the NPDES/County SWPPP process, and NPDES Groundwater and Municipal Permits, as appropriate.

- d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The project will obtain its water supply from the Rincon MWD that obtains water from surface reservoirs or other imported water source. The project will not use any groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge including, but not limited to the following: regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g. 0.25 mile). Therefore, no substantial depletion or interference with recharge would occur and no impact to groundwater resources is identified.

- e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: The project is expected to continue to drain primarily to the north and west, and to retain overall existing drainage features, including the use of similar outlet points for flows discharged from the site. The potential exists for alteration of the

existing drainage pattern of the area in a manner which could result in substantial erosion or siltation because of the level of proposed grading. The applicant will be required to design the project to meet the performance standards of the County WPO for flow control and erosion, and surface and ground water quality. Conformance to the WPO will be addressed in the EIR, SWMP and Hydrology/ Drainage Study prepared for the project, as appropriate.

- f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

☒	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Potentially Significant Impact: The project is expected to continue to drain primarily to the north and west, and to retain overall existing drainage features. The project proposes 850,000 cubic yards of cut and fill which could affect flow patterns, as well as construction of addition new impervious surfaces, including pavement and structures. These latter areas would increase both the rate and amount of runoff within the site by reducing infiltration capacity and concentrating flows. Proposed on-site storm drain facilities include a series of curb/gutter inlets and two hydromodification/water quality basins (basins), all of which would be tied to an underground storm drain system of pipelines and related structures. Confirmation that drainage will be conveyed to either natural drainage channels or approved drainage facilities, that project facilities will accommodate peak 100-year storm flows pursuant to County guidelines, and that the proposed project will not substantially alter the existing drainage pattern or substantially increase the rate or amount of runoff in a manner that could result in on- or off-site flooding will be provided in the EIR and SWMP prepared for the project.

- g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

☒	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Potentially Significant Impact: The project proposes construction of impervious surfaces, including pavement and structures. These areas would increase both the rate and amount of runoff within the site by reducing infiltration capacity and concentrating flows. Proposed on-site storm drain facilities include a series of curb/gutter inlets and two hydromodification/water quality basins (basins), all of which would be tied to an underground storm drain system of pipelines and related structures. Confirmation that drainage facilities will accommodate peak 100-year storm flows pursuant to County guidelines, and that runoff from the proposed project will not exceed the capacity of existing or planned storm water drainage systems will be provided in the EIR and SWMP prepared for the project.

- h) Provide substantial additional sources of polluted runoff?

- | | |
|---|---|
| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: The project may involve potential sources of polluted runoff. Therefore, the project must incorporate site design measures and/or source control BMPs and/or treatment control BMPs to reduce potential pollutants in runoff to the maximum extent practicable. These issues will be addressed in the EIR and SWMP prepared for the project.

- i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: Most portions of the Project site, including all proposed habitable structures, are not located within a mapped 500- or 100-year floodplain area as depicted on the associated FEMA FIRM panel (FEMA 2009), County Floodplain Map or County Alluvial Plain Map. The northernmost portion of the site includes areas mapped as Zone AE and "other flood areas" (Zone X), with associated Project facilities located within these designations including the potential on-site WTWRF/sewer elements and the portion of the off-site improvements along Country Club Drive extending across Escondido Creek. This issue will be addressed in the EIR and Hydrology/Drainage Study prepared for the project.

- j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

- | | |
|---|---|
| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: The potential on-site WTWRF/sewer elements and the portion of the off-site improvements along Country Club Drive extending across Escondido Creek are planned to be located within FIRM-identified floodplain. Preliminary analysis of hydraulics associated with the proposed bridge over Escondido Creek by Project Design Consultants indicates that the proposed bridge would not be subject to flood-related hazards or notably redirect/impede flood flows. Preliminary design for potential on-site sewage facilities identifies a pad elevation higher than mapped 100-year flood elevations in this portion of the site. Accordingly, the potential treatment plant site would be elevated above the 100-year flood level under the proposed design, and is not anticipated to notably redirect/impede flood flows. The preliminary bridge and WTWRF design criteria used in this analysis will be verified or refined based on a project-specific HEC-RAS analysis to be conducted as part of the

ongoing project design process. These issues will be analyzed in the EIR, Hydrology/Drainage Study, and HEC-RAS analysis prepared for the project.

- k) Expose people or structures to a significant risk of loss, injury or death involving flooding?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant Impact: The proposed residential lots are located at an elevation that would prevent exposure of people or property to flooding.

- l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property. Therefore, the project will not expose people to a significant risk of loss, injury or death involving flooding as a result of levee or dam failure.

- m) Inundation by seiche, tsunami, or mudflow?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

i. SEICHE

No Impact: The project site is not located along the shoreline of a lake or reservoir; therefore, could not be inundated by a seiche.

ii. TSUNAMI

No Impact: The project site is located more than a mile from the coast; therefore, in the event of a tsunami, would not be inundated.

iii. MUDFLOW

Potentially Significant Impact: Mudflow is a type of landslide. The project site is not within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining

Significance for Geologic Hazards. As described for VI(a)(iv), above, however, this issue will be addressed in the EIR and Geotechnical Report prepared for the project.

X. LAND USE AND PLANNING -- Would the project:

a) Physically divide an established community?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less than Significant Impact: The site is mostly vacant at this time, 453 dwelling units, limited commercial, institutional and open space are proposed. The proposed project will not significantly disrupt or divide the established community for the following reasons:

- No public services are located in the project vicinity that would be blocked by the project, and
- Through access would be provided via retained access easements to landlocked neighbors to the east and would be improved via additional pavement and roadway width.

In addition, community interaction would be improved via road improvements to existing roads that would enhance the existing vehicular and non-vehicular linkages between community members by:

- Improving the intersection of Harmony Grove Road and Country Club Drive;
- Contributing to (or implementing with future fair share contributions by others) the bridge over Escondido Creek which would allow community members to access (or leave) areas south of the creek during flood conditions;
- Marking cross-walks across Country Club Drive from the HGV-approved multi-use trail to the east side of Country Club Drive; and
- Installing a pathway along the east side of Country Club Drive from the intersection with Harmony Grove Road to the southern project entrance that could be used by all existing and future community residents.

As a result, the project will not result in physical division of an existing community, but would rather enhance the ability of community residents to interact.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

- | | |
|---|---|
| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: The project proposes extension of the contiguous HGV Village designation to the project parcels, in accordance with the proposed Specific Plan. A GPA is proposed to change approximately 111.1 acres from Semi-rural Residential (SR-) 0.5 and Rural Lands (RL-) 20 to a combination of SR-0.5 and Village Residential (VR-) 10.9 in the General Plan, and a rezone is proposed to change zoning from A-70 and Rural Residential to S88 (Specific Plan). The proposed land use designations of SR-0.5 and VR-10.9 and zoning would allow a more dense development, with 2 to 10.9 dwellings per acre.

Land Use Element: Changes in land use designations must be reviewed in the context of all relevant goals and policies of the General Plan. A preliminary list of goals and policies that will be examined in the context of the EIR for direct or cumulative issues includes:

General Plan Goal LU-1: A land use plan and development doctrine that sustain the intent and integrity of the Community Development Model and the boundaries between Regional Categories

General Plan Policy LU-1.4: Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

- Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding.
- Potential Village development would be accommodated by the General Plan road network.
- Public facilities and services can support the expansion without a reduction of services to other County residents.
- The expansion is consistent with community character, the scale, and the orderly contiguous growth of a Village area.

General Plan Policy LU-1.12.1: A rural residential lifestyle built in a fashion that is compatible with and sensitive to its natural setting; unspoiled views of intact hills, valleys and creeks.

General Plan Goal LU-3.1: The continued preservation of Harmony Grove's sensitive and endangered habitats.

General Plan Policy LU-3.1.1: Encourage the restoration and maintain the watershed, creeks, and riparian areas.

General Plan Goal LU-3.3: A community where significant prehistoric and historic cultural resources will be preserved. (Harmony Grove)

General Plan Policy LU-3.3.1: Require development to incorporate the prehistoric and historic rural theme of this community.

In addition, because the project is outside of the existing County Sanitation District boundary, it will require annexation and approval by LAFCO. LAFCO is a CEQA "Responsible Agency" and will make its annexation determinations relying upon the project's certified EIR. Therefore, the EIR must consider appropriate LAFCO policies and impact analysis related to the provision of services under LAFCO's purview.

The EIR must also discuss compliance with ordinances and regulations applicable to the project, including but not limited to:

County of San Diego Resource Protection Ordinance
County of San Diego Stormwater and Watershed Protection Ordinances
County of San Diego Habitat Loss Permit Ordinance (NCCP)
County of San Diego Noise Ordinance
State and local fire regulations.

All of these issues will be addressed in the EIR for the project.

XI. MINERAL RESOURCES -- Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant Impact: The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of "Potential Mineral Resource Significance" (MRZ-3). However, the project site is surrounded by existing and proposed residential areas which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project will not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible surrounding land uses.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The project site is not located in an area that has MRZ-2 designated lands or is located within 1,300 feet of such lands. Therefore, the proposed project would not result in the

loss of availability of locally important mineral resource(s). No potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan will occur as a result of this project.

XII. NOISE -- Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: The project is a large residential development that would involve major grading and construction activities. The surrounding area supports residential and open space land and the project may expose people to potentially significant noise levels that exceed allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards.

Impacts could occur on a direct and/or potentially cumulative basis. These issues and conformance to the Noise Element and applicable ordinances will be addressed in the EIR and Acoustical Analysis Report prepared for the project.

- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: The project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area. During construction, however, the project proposes potential blasting as well as pile-driving and/or vibratory rollers. Each of these could adversely affect off-site uses. These issues will be addressed in the EIR and Acoustical Analysis Report prepared for the project.

- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: The project proposes a potential WTWRF, which may result in noise generation impacts, as well as additional vehicular activity that could increase ambient noise levels. The nature of any project-associated direct (or contribution to a cumulative) permanent increase in ambient noise levels in the project vicinity will be addressed in the EIR and Acoustical Analysis Report prepared for the project.

- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

☒	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Potentially Significant Impact: Although construction operations would occur only during permitted hours of operation, potential impacts may occur if construction noise limits of the County of San Diego Noise Ordinance (Section 36.409) are exceeded. Also, as noted, the potential WTWRF would contain emergency generator(s). The nature of any project-associated direct (or contribution to a cumulative) temporary or periodic increase in ambient noise levels in the project vicinity in the EIR and Acoustical Analysis Report prepared for the project.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☒	No Impact

No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. Therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☒	No Impact

No Impact: The proposed project is not located within a one-mile vicinity of a private airstrip; therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

XIII. POPULATION AND HOUSING -- Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: Growth is not considered positive or negative in itself, but is an element of the project that must be analyzed through the physical environmental changes it causes. The project proposes 453 dwelling units; a GPA; transportation improvements along existing roadways to upgrade local access, and utility upgrades that include extension of water, sewer, and reclaimed water lines, as well as potential installation of an on-site WTWRF. These physical and regulatory changes could induce substantial population growth in an area, because the changes could support additional increases in adjacent parcel density or intensity of land uses that are inconsistent with the General Plan. This will be addressed in the EIR prepared for the project.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The proposed project will not displace existing housing since the site is currently vacant. The addition of 453 dwelling units will yield a net gain of available housing.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The proposed project will not displace a substantial number of people since the site is currently vacant.

XIV. PUBLIC SERVICES

- a) 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 any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

☒	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Potentially Significant Impact: The proposed project would receive fire protection from the San Diego County Fire Authority. The fire station primarily serving the project must meet County standards for emergency travel time to the site. This is expected to be the Harmony Grove fire station currently under construction as part of Harmony Grove Village. Per the Project Availability Form, the project is in the district and eligible for service and the station will be available to provide that service. The project will be conditioned to provide fair share payments to the facility. Additional conditions requiring construction are all associated with project development (e.g., fuel management, on-site roads width and turn radii, structural requirements, etc.) and are being addressed in the EIR and Fire Protection Plan (FPP) prepared for the project.

The provision of sheriff department personnel is funded through the County's general fund, revenues which come largely from property taxes. The station serving the project area is located in San Marcos. Service demand would likely increase with implementation of the project. It is anticipated that expanded police protection services would be funded, as necessary, from increased property taxes and other revenues to the County resulting from the project, and that any additional staff would be absorbed by the San Marcos Sherriff's office with no additional facilities required. This issue will be addressed in the EIR prepared for the project.

The project is located within the Escondido Union School District and the Escondido Union High School District and it is eligible for service. Project Availability Forms provided by the districts indicate that the project is within their service areas and is eligible for service, but that the project will result in overcrowding. Impacts to school facilities will be addressed through the payment of fees pursuant to State Law prior to the issuance of Building Permits. This issue will be addressed in the EIR prepared for the project.

No new off-site parks are proposed to be constructed by the project.

The project proposes to receive water service from the Rincon MWD. Per the Project Availability Form provided by the district, facilities to serve the project are reasonably expected to be available within the next five years.

The project proposes to annex to the County Sanitation District for operation and maintenance of the proposed wastewater treatment facility. The project is required to provide an infrastructure study, as well as a policy analysis to determine the feasibility of the proposal for sewer service. These issues will be addressed in the EIR and Sewer Master Plan provided for the project.

The sewer service annexation and the ability of the districts to serve the project must be evaluated in the EIR and be adequate for the LAFCO and the serving districts to use for their environmental determinations.

Physical environmental changes that could result from extending service to the project site may result in significant environmental impacts. As a result, footprint issues associated with each of the relevant technical analyses for the provision of public services, as well as related contributions to cumulative effects potentially requiring new facilities, will be analyzed in the EIR and the project and technical analyses as appropriate.

XV. RECREATION

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

☒	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Potentially Significant Impact: The project involves a residential subdivision that will increase the use of existing neighborhood and regional parks or other recreational facilities. To avoid substantial physical deterioration of local recreation facilities the project will be required to pay fees or dedicate land for local parks to the County pursuant to the Park Land Dedication Ordinance (PLDO). The project is proposing private parks within the project site which would qualify for partial credit (up to 50 percent of the acreage). The remaining requirement would be satisfied through the payment of in lieu fees. In addition to the active parkland, the project proposes over 70 acres of other open space, which includes a restored drainage with pathways and biological open space areas with unimproved primitive trails. Specifics on the project recreational facilities, as well as in lieu fee payment, will be addressed in the EIR prepared for the project.

With regard to regional recreational facilities, there are over 21,765 acres of regional parkland owned by the County, which exceeds the General Plan standard of 15 acres per 1,000 population. In addition, there are over one million acres of publicly owned land in San Diego County dedicated to parks or open space including Federal lands, State parks, special districts, and regional river parks. Due to the extensive acreage of existing publicly owned lands that can be used for recreation, the project will not result in substantial physical deterioration of regional recreational facilities or accelerate the deterioration of regional parkland. Moreover, the project will not result in a cumulatively considerable deterioration or accelerated

deterioration of regional recreation facilities because even with all past, present and future residential projects a significant amount of regional recreational facilities will be available to County residents.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: The project proposes new recreational facilities that would be located on the project parcels and would require land currently in an undeveloped state. The new facilities will potentially result in adverse direct and cumulative physical effects on the environment. These facilities will be evaluated as part of the overall project footprint, and will be addressed in the EIR prepared for the project.

XVI. TRANSPORTATION AND TRAFFIC -- Would the project:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact:

The proposed project is calculated to generate 4,530 ADT, with a total of approximately 360 trips during the a.m. peak hour (108 inbound/252 outbound trips) and 450 total trips during p.m. peak hour (315 inbound/135 outbound), and it may have impacts related to performance measures and measures of effectiveness of the circulation system, as adopted by the Mobility Element of the San Diego County General Plan. Therefore, the project would have a direct impact related to a conflict with policies establishing measures of the effectiveness for the performance of the circulation system.

The project's added traffic is expected to result in cumulative impacts to Country Club Drive in the County and to both direct and cumulative effects in the City of Escondido. Intersections in both the County and City are also expected to be impacted. The project will also add traffic to Caltrans facilities (westbound SR-78 west of Nordahl) that are projected to operate at an unacceptable LOS.

The County of San Diego has developed an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County.

This program was created as a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from planned future development. The TIF was based on SANDAG regional growth and land use forecasts as analyzed in the SANDAG Regional Transportation Model and projected to build-out (year 2030) development conditions on the existing Mobility Element roadway network throughout the unincorporated area of the County. Since the project is a GPA and would increase the ADT that would occur in the future, the project will also be required to contribute to an update of the TIF program to include the project and its increased density. In the City of Escondido, the project would be required to implement improvements and/or make fair share payments, as applicable.

The significance of direct and cumulative project-related impacts on all of these facilities, as well as the appropriate mitigation, will be fully addressed in the EIR and Traffic Impact Study prepared for the project.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: The proposed project's traffic exceeds the threshold of 2,400 ADT and may result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions. Therefore, the proposal could result in a potential degradation of the level of service standard established by the County congestion management agency for designated roads or highways. These issues will be addressed in the EIR and Traffic Impact Analysis prepared for the project.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport; therefore, the project will not result in a change in air traffic patterns.

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation	☐ No Impact

Incorporated

Potentially Significant Impact: The project must demonstrate safe and adequate sight distance of driveways and intersections to the satisfaction of the Director of the Department of Public Works. All road improvements will be constructed according to the County of San Diego Public and Private Road Standards. Operational and construction traffic must be analyzed for traffic hazards and adequate sight distance. These issues will be addressed in the EIR and Traffic Impact Analysis prepared for the project.

e) Result in inadequate emergency access?

- | | | | |
|-------------------------------------|---------------------------------------|--------------------------|------------------------------|
| ☒ | Potentially Significant Impact | ☐ | Less than Significant Impact |
| ☐ | Less Than Significant With Mitigation | ☐ | No Impact |
- Incorporated

Potentially Significant Impact: The San Diego County Fire Authority must approve the proposed project and associated emergency access roadways to determine that access to the project does not exceed the maximum cumulative dead-end road length specified in the San Diego County Consolidated Fire Code. The fire station or stations serving the project also must meet County standards for emergency travel time to the site. These issues will be addressed in the EIR and Fire Protection Plan prepared for the project.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

- | | | | |
|-------------------------------------|---------------------------------------|--------------------------|------------------------------|
| ☒ | Potentially Significant Impact | ☐ | Less than Significant Impact |
| ☐ | Less Than Significant With Mitigation | ☐ | No Impact |
- Incorporated

Potentially Significant Impact: There is no existing public transit, or dedicated bicycle or pedestrian facilities in the project vicinity that would be affected by the project. The project is expected to generate increased travel demand for such transit, pedestrian or bicycle facilities. The project would provide a pathway along the west side of the project and on the east side of Country Club Drive that would accommodate pedestrians (and potentially bicyclists) until the multi-purpose trail on the west side of Country Club Drive associated with Harmony Grove Village is implemented. The issues of compatibility with policies, plans, or programs regarding public transit, bicycle and pedestrian facilities will be addressed in the EIR prepared for the project.

XVII. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

- | | | | |
|-------------------------------------|---------------------------------------|--------------------------|------------------------------|
| ☒ | Potentially Significant Impact | ☐ | Less than Significant Impact |
| ☐ | Less Than Significant With Mitigation | ☐ | No Impact |

Incorporated

Potentially Significant Impact: The project proposes potential utilization of a new package sewage treatment system, or alternatively to link into the Harmony Grove Water Reclamation Facility 550 feet north of the project for effluent treatment/disposal. Processed and discharged wastewater must conform to the RWQCB's applicable standards, including the Regional Basin Plan and the California Water Code. Issues associated with wastewater treatment requirements will be addressed in the EIR and Sewer Master Plan prepared for the project.

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation	☐ No Impact

Incorporated

Potentially Significant Impact: The project would require expansion of potable water pipelines within Country Club Drive, both to the west and north. The project also proposes to potentially construct a new package sewage treatment system for effluent treatment/disposal, which would also require construction of a new on-site influent pump station. In addition, sewage and reclaimed water pipelines would be required in Country Club Drive and potentially in Harmony Grove Road. Processed and discharged wastewater must conform to the RWQCB's applicable standards, including the Regional Basin Plan and the California Water Code. These footprint impacts and direct and cumulative planning issues will be addressed in the EIR, the Sewer Master Plan, and other technical studies prepared for the project as appropriate.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation	☐ No Impact

Incorporated

Potentially Significant Impact: The project includes new stormwater drainage facilities. Moreover, the project involves landform modification including source treatment and structural Best Management Practices for storm water. These new facilities comprise part of the project footprint and would be placed on lands which are currently undeveloped. They may therefore result in adverse direct and cumulative physical effects on the environment. Potential environmental impacts will be addressed in the EIR and the Biological Technical Report and CEQA Preliminary Hydrology/Drainage Study prepared for the project.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

- | | |
|---|---|
| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: The proposed project site is included in the San Diego County Water Authority (SDCWA) boundary line. The site is within the Rincon MWD service district. The Project Facility Availability Form received from the district indicated that facilities to serve the project site are expected to be available within five years. The accompanying letter stated that it is currently eligible to receive water for fire and normal domestic use following completion of those facilities. It also stated however, that ongoing drought issues may result in re-evaluation of water availability. This issue will be addressed in the EIR prepared for the project.

- e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

- | | |
|---|---|
| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: The project proposes to annex into the San Diego County Sanitation District and either build a WTWRF, to provide wastewater treatment and reclamation service or to tie into the existing Harmony Grove Water Reclamation Facility. The Project Facility Availability Form provided by the district stated that the capacity will be available subject to a series of attached conditions. Those conditions will be addressed in the EIR and Sewer Master Plan prepared for the project.

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less than Significant Impact: Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE:

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

- | | |
|---|---|
| ☒ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Potentially Significant Impact: Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. As a result of this evaluation, the project was determined to have potential significant direct effects related to aesthetics, air quality, biological resources (loss of sensitive habitat, adverse impacts on sensitive species, jurisdictional waters, migration corridors), cultural resources (historic resources, and archaeological resources), greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, recreation, transportation/traffic, and utilities and service systems. While mitigation can be developed in some instances that reduce would these effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear at this

time. Therefore, this project has been determined to potentially meet this Mandatory Finding of Significance.

- b) Does the project have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: A total of 65 projects in the vicinity of the proposed project, as well as the proposed project, are being considered in the analysis of cumulative impacts. The list consists of projects that are pending or recently approved within the County, as well as adjacent jurisdictions (the City of Escondido and City of San Marcos). Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XVIII of this form. In addition to project specific impacts, this evaluation considered the project's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there were determined to be potentially significant cumulative effects related to aesthetics, air quality, biological resources, cultural resources, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, public services, recreation, transportation/ traffic and utilities and service systems. While mitigation can be developed in some instances which may reduce these cumulative effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear at this time. Therefore, this project has been determined to potentially meet this Mandatory Finding of Significance.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

☒ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Potentially Significant Impact: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VIII. Hazards and Hazardous Materials, XII. Noise, XIII. Population and Housing, and XVI. Transportation and Traffic. As a result of this evaluation, there were determined to be potentially significant effects related to each of the listed categories. While mitigation can be developed in some instances that reduce these significant effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear at this time. Therefore, this project has been determined to potentially meet this Mandatory Finding of Significance.

XIX. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For State regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

AESTHETICS

California Street and Highways Code [California Street and Highways Code, Section 260-283. (<http://www.leginfo.ca.gov/>)

California Scenic Highway Program, California Streets and Highways Code, Section 260-283. (<http://www.dot.ca.gov/hq/LandArch/scenic/scpr.htm>)

County of San Diego, Planning & Development Services. The Zoning Ordinance of San Diego County. Sections 5200-5299; 5700-5799; 5900-5910, 6322-6326. (www.co.san-diego.ca.us)

County of San Diego, Board Policy I-73: Hillside Development Policy. (www.co.san-diego.ca.us)

County of San Diego, Board Policy I-104: Policy and Procedures for Preparation of Community Design Guidelines, Section 396.10 of the County Administrative Code and Section 5750 et seq. of the County Zoning Ordinance. (www.co.san-diego.ca.us)

County of San Diego Light Pollution Code, Title 5, Division 9 (Sections 59.101-59.115 of the County Code of Regulatory Ordinances) as added by Ordinance No 6900, effective January 18, 1985, and amended July 17, 1986 by Ordinance No. 7155. (www.amlegal.com)

County of San Diego Wireless Communications Ordinance [San Diego County Code of Regulatory Ordinances. (www.amlegal.com)

Design Review Guidelines for the Communities of San Diego County. (Alpine, Bonsall, Fallbrook, Julian, Lakeside, Ramona, Spring Valley, Sweetwater, Valley Center).

Federal Communications Commission, Telecommunications Act of 1996 [Telecommunications Act of 1996, Pub. LA. No. 104-104, 110 Stat. 56 (1996). (<http://www.fcc.gov/Reports/tcom1996.txt>)

Institution of Lighting Engineers, Guidance Notes for the Reduction of Light Pollution, Warwickshire, UK, 2000 (<http://www.dark-skies.org/ile-gd-e.htm>)

International Light Inc., Light Measurement Handbook, 1997. (www.intl-light.com)

Rensselaer Polytechnic Institute, Lighting Research Center, National Lighting Product Information Program (NLPPI), Lighting Answers, Volume 7, Issue 2, March 2003. (www.lrc.rpi.edu)

US Census Bureau, Census 2000, Urbanized Area Outline Map, San Diego, CA. (<http://www.census.gov/geo/www/maps/ua2kmaps.htm>)

US Department of the Interior, Bureau of Land Management (BLM) modified Visual Management System. (www.blm.gov)

US Department of Transportation, Federal Highway Administration (FHWA) Visual Impact Assessment for Highway Projects.

US Department of Transportation, National Highway System Act of 1995 [Title III, Section 304. Design Criteria for the National Highway System. (<http://www.fhwa.dot.gov/legregs/nhsdatoc.html>)

AGRICULTURE RESOURCES

California Department of Conservation, Farmland Mapping and Monitoring Program, "A Guide to the Farmland Mapping and Monitoring Program," November 1994. (www.consrv.ca.gov)

California Department of Conservation, Office of Land Conversion, "California Agricultural Land Evaluation and Site Assessment Model Instruction Manual," 1997. (www.consrv.ca.gov)

California Farmland Conservancy Program, 1996. (www.consrv.ca.gov)

California Land Conservation (Williamson) Act, 1965. (www.ceres.ca.gov, www.consrv.ca.gov)

California Right to Farm Act, as amended 1996. (www.qp.gov.bc.ca)

County of San Diego Agricultural Enterprises and Consumer Information Ordinance, 1994, Title 6, Division 3, Ch. 4. Sections 63.401-63.408. (www.amlegal.com)

County of San Diego, Department of Agriculture, Weights and Measures, "2002 Crop Statistics and Annual Report," 2002. (www.sdcountry.ca.gov)

United States Department of Agriculture, Natural Resource Conservation Service LESA System. (www.nrcs.usda.gov, www.swcs.org).

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973. (soils.usda.gov)

AIR QUALITY

CEQA Air Quality Analysis Guidance Handbook, South Coast Air Quality Management District, Revised November 1993. (www.aqmd.gov)

County of San Diego Air Pollution Control District's Regional Air Quality Strategy Revisions, 2009. (<http://www.sdapcd.org/planning/2009-RAQS.pdf>)

County of San Diego Air Pollution Control District's Rules and Regulations, updated August 2003. (www.co.san-diego.ca.us)

County of San Diego General Plan, adopted January 3, 1979.

Federal Clean Air Act US Code; Title 42; Chapter 85 Subchapter 1. (www4.law.cornell.edu)

BIOLOGY

California Department of Fish and Wildlife (CDFW). Southern California Coastal Sage Scrub Natural Community Conservation Planning Process Guidelines. CDFW and

- California Resources Agency, Sacramento, California. 1993. (www.dfg.ca.gov)
- County of San Diego, An Ordinance Amending the San Diego County Code to Establish a Process for Issuance of the Coastal Sage Scrub Habitat Loss Permits and Declaring the Urgency Thereof to Take Effect Immediately, Ordinance No. 8365. 1994, Title 8, Div 6, Ch. 1. Sections 86.101-86.105, 87.202.2. (www.amlegal.com)
- County of San Diego, Biological Mitigation Ordinance, Ord. Nos. 8845, 9246, 1998 (new series). (www.co.san-diego.ca.us)
- County of San Diego, Implementing Agreement by and between United States Fish and Wildlife Service, California Department of Fish and Wildlife and County of San Diego. County of San Diego, Multiple Species Conservation Program, 1998.
- County of San Diego, Multiple Species Conservation Program, County of San Diego Subarea Plan, 1997.
- Holland, R.R. Preliminary Descriptions of the Terrestrial Natural Communities of California. State of California, Resources Agency, Department of Fish and Wildlife, Sacramento, California, 1986.
- Memorandum of Understanding [Agreement Between United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), California Department of Forestry and Fire Protection (CDF), San Diego County Fire Chief's Association and the Fire District's Association of San Diego County.
- Stanislaus Audubon Society, Inc. v County of Stanislaus (5th Dist. 1995) 33 Cal.App.4th 144, 155-159 [39 Cal. Rptr.2d 54]. (www.ceres.ca.gov)
- U.S. Army Corps of Engineers Environmental Laboratory. Corps of Engineers Wetlands Delineation Manual. U.S. Army Corps of Engineers, Wetlands Research Program Technical Report Y-87-1. 1987. (<http://www.wes.army.mil/>)
- U.S. Environmental Protection Agency. America's wetlands: our vital link between land and water. Office of Water, Office of Wetlands, Oceans and Watersheds. EPA843-K-95-001. 1995b. (www.epa.gov)
- U.S. Fish and Wildlife Service and National Marine Fisheries Service. Habitat Conservation Planning Handbook. Department of Interior, Washington, D.C. 1996. (endangered.fws.gov)
- U.S. Fish and Wildlife Service and National Marine Fisheries Service. Consultation Handbook: Procedures for Conducting Consultation and Conference Activities Under Section 7 of the Endangered Species Act. Department of Interior, Washington, D.C. 1998. (endangered.fws.gov)
- U.S. Fish and Wildlife Service. Environmental Assessment and Land Protection Plan for the Vernal Pools Stewardship Project. Portland, Oregon. 1997.
- U.S. Fish and Wildlife Service. Vernal Pools of Southern California Recovery Plan. U.S. Department of Interior, Fish and Wildlife Service, Region One, Portland, Oregon, 1998. (ecos.fws.gov)
- U.S. Fish and Wildlife Service. Birds of conservation concern 2002. Division of Migratory. 2002. (migratorybirds.fws.gov)
- CULTURAL RESOURCES**
- California Health & Safety Code. §18950-18961, State Historic Building Code. (www.leginfo.ca.gov)
- California Health & Safety Code. §5020-5029, Historical Resources. (www.leginfo.ca.gov)
- California Health & Safety Code. §7050.5, Human Remains. (www.leginfo.ca.gov)
- California Native American Graves Protection and Repatriation Act, (AB 978), 2001. (www.leginfo.ca.gov)
- California Public Resources Code §5024.1, Register of Historical Resources. (www.leginfo.ca.gov)
- California Public Resources Code. §5031-5033, State Landmarks. (www.leginfo.ca.gov)
- California Public Resources Code. §5097-5097.6, Archaeological, Paleontological, and Historic Sites. (www.leginfo.ca.gov)
- California Public Resources Code. §5097.9-5097.991, Native American Heritage. (www.leginfo.ca.gov)
- City of San Diego. Paleontological Guidelines. (revised) August 1998.
- County of San Diego, Local Register of Historical Resources (Ordinance 9493), 2002. (www.co.san-diego.ca.us)
- Demere, Thomas A., and Stephen L. Walsh. Paleontological Resources San Diego County. Department of Paleontology, San Diego Natural History Museum. 1994.
- Moore, Ellen J. Fossil Mollusks of San Diego County. San Diego Society of Natural history. Occasional; Paper 15. 1968.
- RECON Environmental, Inc. Results of Cultural Resources Survey for the Harmony Grove Meadows Project. October 17, 2006.
- U.S. Code including: American Antiquities Act (16 USC §431-433) 1906. Historic Sites, Buildings, and Antiquities Act (16 USC §461-467), 1935. Reservoir Salvage Act (16 USC §469-469c) 1960. Department of Transportation Act (49 USC §303) 1966. National Historic Preservation Act (16 USC §470 et seq.) 1966. National Environmental Policy Act (42 USC §4321) 1969. Coastal Zone Management Act (16 USC §1451) 1972. National Marine Sanctuaries Act (16 USC §1431) 1972. Archaeological and Historical Preservation Act (16 USC §469-469c) 1974. Federal Land Policy and Management Act (43 USC §35) 1976. American Indian Religious Freedom Act (42 USC §1996 and 1996a) 1978. Archaeological Resources Protection Act (16 USC §470aa-mm) 1979. Native American Graves Protection and Repatriation Act (25 USC §3001-3013) 1990. Intermodal Surface Transportation Efficiency Act (23 USC §101, 109) 1991. American Battlefield Protection Act (16 USC 469k) 1996. (www4.law.cornell.edu)
- GEOLOGY & SOILS**
- California Department of Conservation, Division of Mines and Geology, California Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997. (www.consrv.ca.gov)
- California Department of Conservation, Division of Mines and Geology, Fault-Rupture Hazard Zones in California, Special Publication 42, revised 1997. (www.consrv.ca.gov)
- California Department of Conservation, Division of Mines and Geology, Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, 1997. (www.consrv.ca.gov)
- California Geological Survey (CGS). Fault Activity Map of California. Geologic Data Map No. 6, 2010.

California Geological Survey (CGS). Special Publication 42, Fault Rupture Hazard Zones in California. Interim revisions current through 2007.

(<ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>)

County of San Diego Code of Regulatory Ordinances Title 6, Division 8, Chapter 3, Septic Ranks and Seepage Pits. (www.amlegal.com)

County of San Diego Department of Environmental Health, Land and Water Quality Division, February 2002. On-site Wastewater Systems (Septic Systems): Permitting Process and Design Criteria. (www.sdcountry.ca.gov)

County of San Diego Natural Resource Inventory, Section 3, Geology.

County of San Diego Guidelines for Determining Significance, Geologic Hazards. 2007

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973. (soils.usda.gov)

HAZARDS & HAZARDOUS MATERIALS

American Planning Association, Zoning News, "Saving Homes from Wildfires: Regulating the Home Ignition Zone," May 2001.

California Building Code (CBC), Seismic Requirements, Chapter 16 Section 162. (www.buildersbook.com)

California Education Code, Section 17215 and 81033. (www.leginfo.ca.gov)

California Government Code. § 8585-8589, Emergency Services Act. (www.leginfo.ca.gov)

California Hazardous Waste and Substances Site List. April 1998. (www.dtsc.ca.gov)

California Health & Safety Code Chapter 6.95 and §25117 and §25316. (www.leginfo.ca.gov)

California Health & Safety Code § 2000-2067. (www.leginfo.ca.gov)

California Health & Safety Code. §17922.2. Hazardous Buildings. (www.leginfo.ca.gov)

California Public Utilities Code, SDCRAA. Public Utilities Code, Division 17, Sections 170000-170084. (www.leginfo.ca.gov)

California Resources Agency, "OES Dam Failure Inundation Mapping and Emergency Procedures Program", 1996. (ceres.ca.gov)

County of San Diego, Department of Environmental Health, Hazardous Materials Division. California Accidental Release Prevention Program (CalARP) Guidelines. (<http://www.sdcountry.ca.gov>, www.oes.ca.gov)

County of San Diego, Department of Environmental Health, Hazardous Materials Division. Hazardous Materials Business Plan Guidelines. (www.sdcountry.ca.gov)

Uniform Building Code. (www.buildersbook.com)

Uniform Fire Code 1997 edition published by the Western Fire Chiefs Association and the International Conference of Building Officials, and the National Fire Protection Association Standards 13 & 13-D, 1996 Edition, and 13-R, 1996 Edition. (www.buildersbook.com)

HYDROLOGY & WATER QUALITY

American Planning Association, Planning Advisory Service Report Number 476 Non-point Source Pollution: A Handbook for Local Government

California Department of Water Resources, California Water Plan Update. Sacramento: Dept. of Water Resources State of California. 1998. (rubicon.water.ca.gov)

California Department of Water Resources, California's Groundwater Update 2003 Bulletin 118, April 2003. (www.groundwater.water.ca.gov)

California Department of Water Resources, Water Facts, No. 8, August 2000. (www.dpla2.water.ca.gov)

California Disaster Assistance Act. Government Code, § 8680-8692. (www.leginfo.ca.gov)

California State Water Resources Control Board, NPDES General Permit Nos. CAS000001 INDUSTRIAL ACTIVITIES (97-03-DWQ) and CAS000002 Construction Activities (No. 99-08-DWQ) (www.swrcb.ca.gov)

California Storm Water Quality Association, California Storm Water Best Management Practice Handbooks, 2003.

California Water Code, Sections 10754, 13282, and 60000 et seq. (www.leginfo.ca.gov)

Colorado River Basin Regional Water Quality Control Board, Region 7, Water Quality Control Plan. (www.swrcb.ca.gov)

County of San Diego Regulatory Ordinance, Title 8, Division 7, Grading Ordinance. Grading, Clearing and Watercourses. (www.amlegal.com)

County of San Diego, Groundwater Ordinance. #7994. (www.sdcountry.ca.gov, <http://www.amlegal.com/>.)

County of San Diego, Project Clean Water Strategic Plan, 2002. (www.projectcleanwater.org)

County of San Diego, Watershed Protection, Storm Water Management, and Discharge Control Ordinance, Ordinance Nos. 9424 and 9426. Chapter 8, Division 7, Title 6 of the San Diego County Code of Regulatory Ordinances and amendments. (www.amlegal.com)

County of San Diego. Board of Supervisors Policy I-68. Diego Proposed Projects in Flood Plains with Defined Floodways. (www.co.san-diego.ca.us)

Federal Water Pollution Control Act (Clean Water Act), 1972, Title 33, Ch.26, Sub-Ch.1. (www4.law.cornell.edu)

Freeze, Allan and Cherry, John A., Groundwater, Prentice-Hall, Inc. New Jersey, 1979.

Heath, Ralph C., Basic Ground-Water Hydrology, United States Geological Survey Water-Supply Paper; 2220, 1991.

National Flood Insurance Act of 1968. (www.fema.gov)

National Flood Insurance Reform Act of 1994. (www.fema.gov)

Porter-Cologne Water Quality Control Act, California Water Code Division 7. Water Quality. (ceres.ca.gov)

San Diego Association of Governments, Water Quality Element, Regional Growth Management Strategy, 1997. (www.sandag.org)

San Diego Regional Water Quality Control Board, NPDES Permit No. CAS0108758. (www.swrcb.ca.gov)

San Diego Regional Water Quality Control Board, Water Quality Control Plan for the San Diego Basin. (www.swrcb.ca.gov)

LAND USE & PLANNING

California Department of Conservation Division of Mines and Geology, Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production Consumption Region, 1996. (www.consrv.ca.gov)

California Environmental Quality Act, Public Resources Code 21000-21178; California Code of Regulations, Guidelines for Implementation of CEQA, Appendix G, Title 14, Chapter 3, §15000-15387. (www.leginfo.ca.gov)

California State Mining and Geology Board, SP 51, California Surface Mining and Reclamation Policies and Procedures, January 2000. (www.consrv.ca.gov)

County of San Diego, Board of Supervisors Policy I-84: Project Facility. (www.sdcountry.ca.gov)

County of San Diego, Board Policy I-38, as amended 1989. (www.sdcountry.ca.gov)

County of San Diego, General Plan as adopted August 3, 2011. (ceres.ca.gov)

County of San Diego. Resource Protection Ordinance, compilation of Ord.Nos. 7968, 7739, 7685 and 7631. 1991.

Design Review Guidelines for the Communities of San Diego County.

MINERAL RESOURCES

National Environmental Policy Act, Title 42, 36.401 et. seq. 1969. (www4.law.cornell.edu)

Subdivision Map Act, 2011. (ceres.ca.gov)

U.S. Geologic Survey, Causey, J. Douglas, 1998, MAS/MILS Mineral Location Database.

U.S. Geologic Survey, Frank, David G., 1999, (MRDS) Mineral Resource Data System.

NOISE

California State Building Code, Part 2, Title 24, CCR, Appendix Chapter 3, Sound Transmission Control, 1988. . (www.buildersbook.com)

County of San Diego Code of Regulatory Ordinances, Title 3, Div 6, Chapter 4, Noise Abatement and Control, effective February 4, 1982. (www.amlegal.com)

County of San Diego General Plan, Noise Element, effective August 3, 2011. (ceres.ca.gov)

Federal Aviation Administration, Federal Aviation Regulations, Part 150 Airport Noise Compatibility Planning (revised January 18, 1985). (<http://www.access.gpo.gov>)

Harris Miller Miller and Hanson Inc., *Transit Noise and Vibration Impact Assessment*, April 1995. (<http://ntl.bts.gov/data/rail05/rail05.html>)

International Standard Organization (ISO), ISO 362; ISO 1996 1-3; ISO 3095; and ISO 3740-3747. (www.iso.ch)

U.S. Department of Transportation, Federal Highway Administration, Office of Environment and Planning, Noise and Air Quality Branch. "Highway Traffic Noise Analysis and Abatement Policy and Guidance," Washington, D.C., June 1995. (<http://www.fhwa.dot.gov/>)

POPULATION & HOUSING

Housing and Community Development Act of 1974, 42 USC 5309, Title 42--The Public Health And Welfare, Chapter 69--Community Development, United States Congress, August 22, 1974. (www4.law.cornell.edu)

National Housing Act (Cranston-Gonzales), Title 12, Ch. 13. (www4.law.cornell.edu)

San Diego Association of Governments Population and Housing Estimates, November 2000. (www.sandag.org)

US Census Bureau, Census 2000. (<http://www.census.gov/>)

RECREATION

County of San Diego Code of Regulatory Ordinances, Title 8, Division 10, Chapter PLDO, §810.101 et seq. Park Lands Dedication Ordinance. (www.amlegal.com)

TRANSPORTATION/TRAFFIC

California Aeronautics Act, Public Utilities Code, Section 21001 et seq. (www.leginfo.ca.gov)

California Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, January 2002.

California Department of Transportation, Environmental Program Environmental Engineering – Noise, Air Quality, and Hazardous Waste Management Office. "Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects," October 1998. (www.dot.ca.gov)

California Public Utilities Code, SDCRAA. Public Utilities Code, Division 17, Sections 170000-170084. (www.leginfo.ca.gov)

California Street and Highways Code. California Street and Highways Code, Section 260-283. (www.leginfo.ca.gov)

County of San Diego, Alternative Fee Schedules with Pass-By Trips Addendum to Transportation Impact Fee Reports, March 2005. (<http://www.sdcountry.ca.gov/dpw/land/pdf/TransImpactFee/attach.pdf>)

County of San Diego Transportation Impact Fee Report. January 2005. (<http://www.sdcountry.ca.gov/dpw/permits-forms/manuals.html>)

Fallbrook & Ramona Transportation Impact Fee Report, County of San Diego, January 2005. (<http://www.sdcountry.ca.gov/dpw/permits-forms/manuals.html>)

Office of Planning, Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, April 1995.

San Diego Association of Governments, 2020 Regional Transportation Plan. Prepared by the San Diego Association of Governments. (www.sandag.org)

San Diego County Regional Airport Authority ALUCP'S (http://www.san.org/sdcraa/airport_initiatives/land_use/adopted_docs.aspx)

US Code of Federal Regulations, Federal Aviation Regulations (FAR), Objects Affecting Navigable Airspace, Title 14, Chapter 1, Part 77. (www.gpoaccess.gov)

UTILITIES & SERVICE SYSTEMS

California Code of Regulations (CCR), Title 14. Natural Resources Division, CIWMB Division 7; and Title 27, Environmental Protection Division 2, Solid Waste. (ccr.oal.ca.gov)

California Integrated Waste Management Act. Public Resources Code, Division 30, Waste Management, Sections 40000-41956. (www.leginfo.ca.gov)

County of San Diego, Board of Supervisors Policy I-78: Small Wastewater. (www.sdcountry.ca.gov)

Unified San Diego County Emergency Services Organization Annex T Emergency Water Contingencies, October 1992. (www.co.san-diego.ca.us)

United States Department of Agriculture, Natural Resource Conservation Service LESA System.

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973.

US Census Bureau, Census 2000.

US Code of Federal Regulations, Federal Aviation Regulations (FAR), Objects Affecting Navigable Airspace, Title 14, Chapter 1, Part 77.

US Department of the Interior, Bureau of Land Management (BLM) modified Visual Management System.

US Department of Transportation, Federal Highway Administration (FHWA) Visual Impact Assessment for Highway Projects.

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Harmony Grove Village South

Lead Agency: County of San Diego

Contact Person: Peter Eichar

Mailing Address: 5510 Overland Ave, Ste 110

Phone: (858) 495-5524

City: San Diego

Zip: 92123

County: San Diego

Project Location: County: San Diego

City/Nearest Community: Escondido

Cross Streets: Country Club Drive and Harmony Grove Road

Zip Code: 92029

Longitude/Latitude (degrees, minutes and seconds): 33 ° 5 ' 41 " N / 117 ° 7 ' 49 " W Total Acres: 111

Assessor's Parcel No.: 235-011-06, 09; 238-021-08, 10

Section: 30

Twp.: 12S

Range: 02W

Base: San Bern

Within 2 Miles: State Hwy #: I-15; SR 78

Waterways: Escondido Creek

Airports:

Railways: NA

Schools:

Document Type:CEQA: ☒ NOP☐ Draft EIRNEPA: ☐ NOIOther: ☐ Joint Document☐ Early Cons☐ Supplement/Subsequent EIR☐ EA☐ Final Document☐ Neg Dec

(Prior SCH No.)

☐ Draft EIS☐ Other:☐ Mit Neg Dec

Other:

☐ FONSI**Local Action Type:**☐ General Plan Update☒ Specific Plan☒ Rezone☒ Annexation☒ General Plan Amendment☐ Master Plan☐ Prezone☐ Redevelopment☐ General Plan Element☐ Planned Unit Development☐ Use Permit☐ Coastal Permit☐ Community Plan☒ Site Plan☒ Land Division (Subdivision, etc.)☒ Other: RPO Wavier**Development Type:**☒ Residential: Units 453 Acres 111☐ Office: Sq.ft. Acres Employees☐ Transportation: Type☒ Commercial: Sq.ft. 5,000 Acres 111 Employees☐ Mining: Mineral☐ Industrial: Sq.ft. Acres Employees☐ Power: Type MW☐ Educational:☒ Waste Treatment: Type Aeromod; typ MGD TBD☒ Recreational: Trails, private and public parks☐ Hazardous Waste: Type☐ Water Facilities: Type MGD☐ Other:**Project Issues Discussed in Document:**☒ Aesthetic/Visual☐ Fiscal☒ Recreation/Parks☒ Vegetation☐ Agricultural Land☒ Flood Plain/Flooding☐ Schools/Universities☒ Water Quality☒ Air Quality☒ Forest Land/Fire Hazard☐ Septic Systems☒ Water Supply/Groundwater☒ Archeological/Historical☒ Geologic/Seismic☒ Sewer Capacity☒ Wetland/Riparian☒ Biological Resources☐ Minerals☐ Soil Erosion/Compaction/Grading☒ Growth Inducement☐ Coastal Zone☒ Noise☐ Solid Waste☒ Land Use☐ Drainage/Absorption☒ Population/Housing Balance☐ Toxic/Hazardous☒ Cumulative Effects☐ Economic/Jobs☒ Public Services/Facilities☒ Traffic/Circulation☐ Other:**Present Land Use/Zoning/General Plan Designation:**

The current Land Use Designation category is Semi-Rural 0.5 (SR-0.5), and the zoning is A70 (Limited Agriculture) and RR (Rural).

Project Description: (please use a separate page if necessary)

Please refer to Notice of Preparation

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

☒ Air Resources Board	☐ Office of Historic Preservation
☐ Boating & Waterways, Department of	☐ Office of Public School Construction
☐ California Emergency Management Agency	☐ Parks & Recreation, Department of
☐ California Highway Patrol	☐ Pesticide Regulation, Department of
☒ Caltrans District # 11	☐ Public Utilities Commission
☐ Caltrans Division of Aeronautics	☒ Regional WQCB #9
☐ Caltrans Planning	☐ Resources Agency
☐ Central Valley Flood Protection Board	☐ Resources Recycling and Recovery, Department of
☐ Coachella Valley Mtns. Conservancy	☐ S.F. Bay Conservation & Development Comm.
☐ Coastal Commission	☐ San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
☐ Colorado River Board	☐ San Joaquin River Conservancy
☐ Conservation, Department of	☐ Santa Monica Mtns. Conservancy
☐ Corrections, Department of	☐ State Lands Commission
☐ Delta Protection Commission	☐ SWRCB: Clean Water Grants
☐ Education, Department of	☐ SWRCB: Water Quality
☐ Energy Commission	☐ SWRCB: Water Rights
☒ Fish & Game Region #5	☐ Tahoe Regional Planning Agency
☐ Food & Agriculture, Department of	☐ Toxic Substances Control, Department of
☐ Forestry and Fire Protection, Department of	☐ Water Resources, Department of
☐ General Services, Department of	
☐ Health Services, Department of	☒ Other: City of Escondido, Planning Department
☐ Housing & Community Development	☐ Other: _____
☐ Native American Heritage Commission	

Local Public Review Period (to be filled in by lead agency)

Starting Date 8/27/15 Ending Date 9/28/15

Lead Agency (Complete if applicable):

Consulting Firm: _____ Applicant: _____
Address: _____ Address: _____
City/State/Zip: _____ City/State/Zip: _____
Contact: _____ Phone: _____
Phone: _____

Signature of Lead Agency Representative: _____

Date: 8-24-15

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



County of San Diego

MARK WARDLAW
DIRECTOR
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FAX (858) 694-2555

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
www.sdcounty.ca.gov/pds

DARREN GRETLER
ASSISTANT DIRECTOR
PHONE (858) 694-2962
FAX (858) 694-2555

NOTICE OF PREPARATION DOCUMENTATION

DATE: August 27, 2015

PROJECT NAME: HARMONY GROVE VILLAGE SOUTH GENERAL PLAN
AMENDMENT, SPECIFIC PLAN, REZONE, TENTATIVE MAP,
AND MAJOR USE PERMIT

PROJECT NUMBERS: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS-REZ-15-003,
PDS2015-TM-5600; PDS2015-MUP-15-008

PROJECT APPLICANT: RCS Harmony Partners, LLC

ENV. REVIEW NUMBER: PDS2015-ER-15-08-006

PROJECT DESCRIPTION:

An Environmental Impact Report will be prepared for the Harmony Grove Village South project. The project application proposes a General Plan Amendment, RPO (steep-slopes) wavier, specific plan, rezone, major use permit and site plan to develop 453 single- and multi-family residential units within 229 structures and a 5,000 square foot facility (the Center House) that will support recreation and community uses in addition to commercial space on 111 acres. The Center House could accommodate a coffee shop or café as well a small (up to four bed B&B facility) overnight facility. A substandard crossing of Escondido Creek that is subject to flooding will be improved to allow for safe ingress and egress to the subject and surrounding properties. A water treatment/water reclamation facility (WTWRF), park/community garden uses, and recreational trail connections to existing and planned trail facilities open to the public are proposed. The project would result in approximately 36 acres of primarily residential development including streets, and approximately 75 acres of undeveloped uses such as landscaping, gardens or biological open space.

PROJECT LOCATION:

The site is located in the southeastern-most portion of the Harmony Grove Valley area of the San Dieguito Community Planning Area, between the City of Escondido (immediately to the east) and the community of Elfin Forest (over 4 miles to the southwest), within unincorporated San Diego County; two and one-half (2.5) miles from Interstate 15 (I-15), and two and six tenths (2.6) of a mile from State Route 78 (SR-78). The project site is located off Country Club

Drive, southeast of the Country Club Drive intersection with Harmony Grove Road, and shares a common boundary with Country Club Drive for approximately three tenths (0.3) mile.

Thomas Guide Coordinates: Page 1129, Grids C6 & 7; D6 & 7

PROBABLE ENVIRONMENTAL EFFECTS:

The probable environmental effects associated with the project are detailed in the Environmental Initial Study, accessible here: http://www.sandiegocounty.gov/content/sdc/pds/Current_Projects/hgvs.html. All questions answered "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" will be analyzed further in the Environmental Impact Report. All questions answered "Less than Significant Impact" or "No Impact" will not be analyzed further in the Environmental Impact Report.

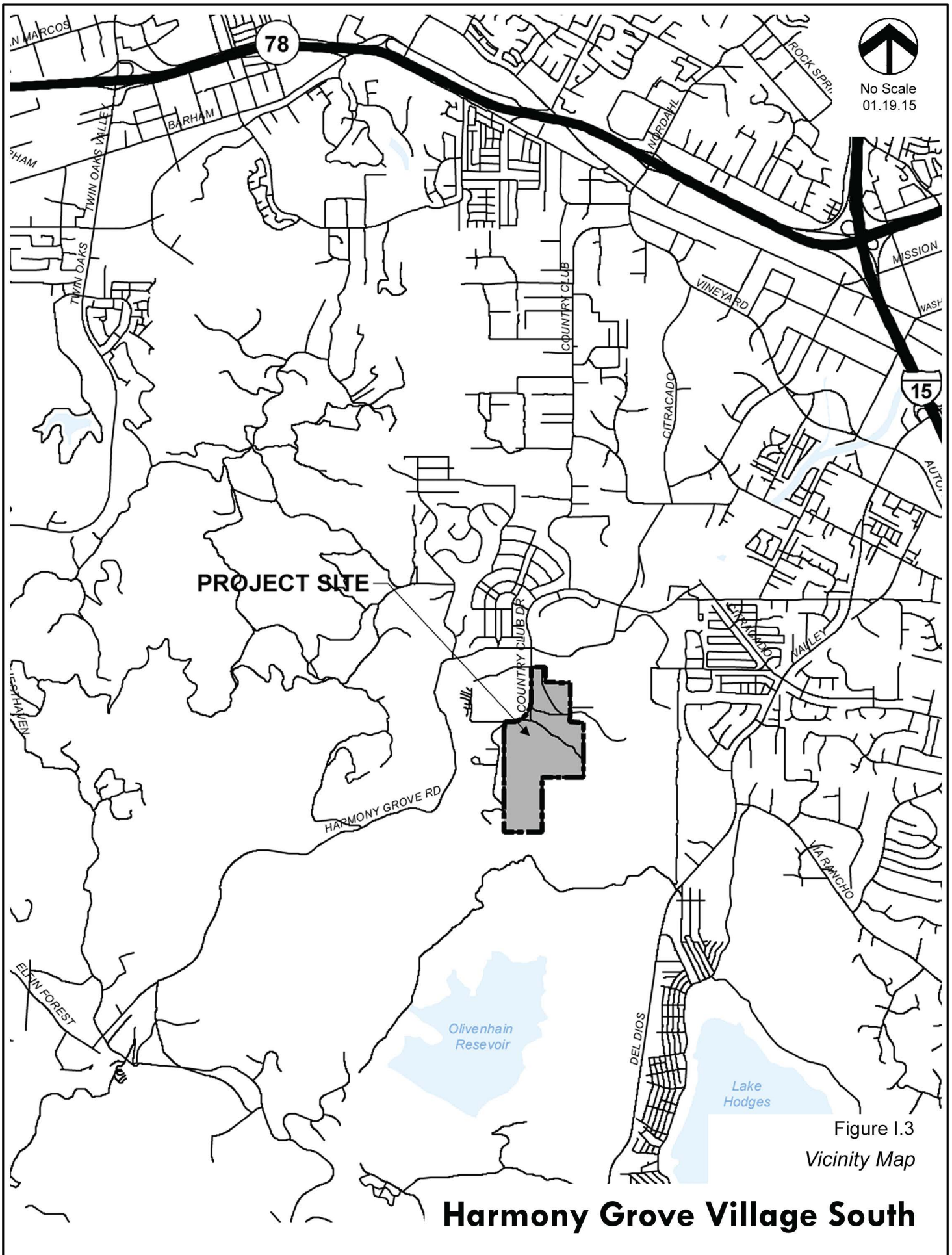
The following is a list of the subject areas to be analyzed in the EIR:

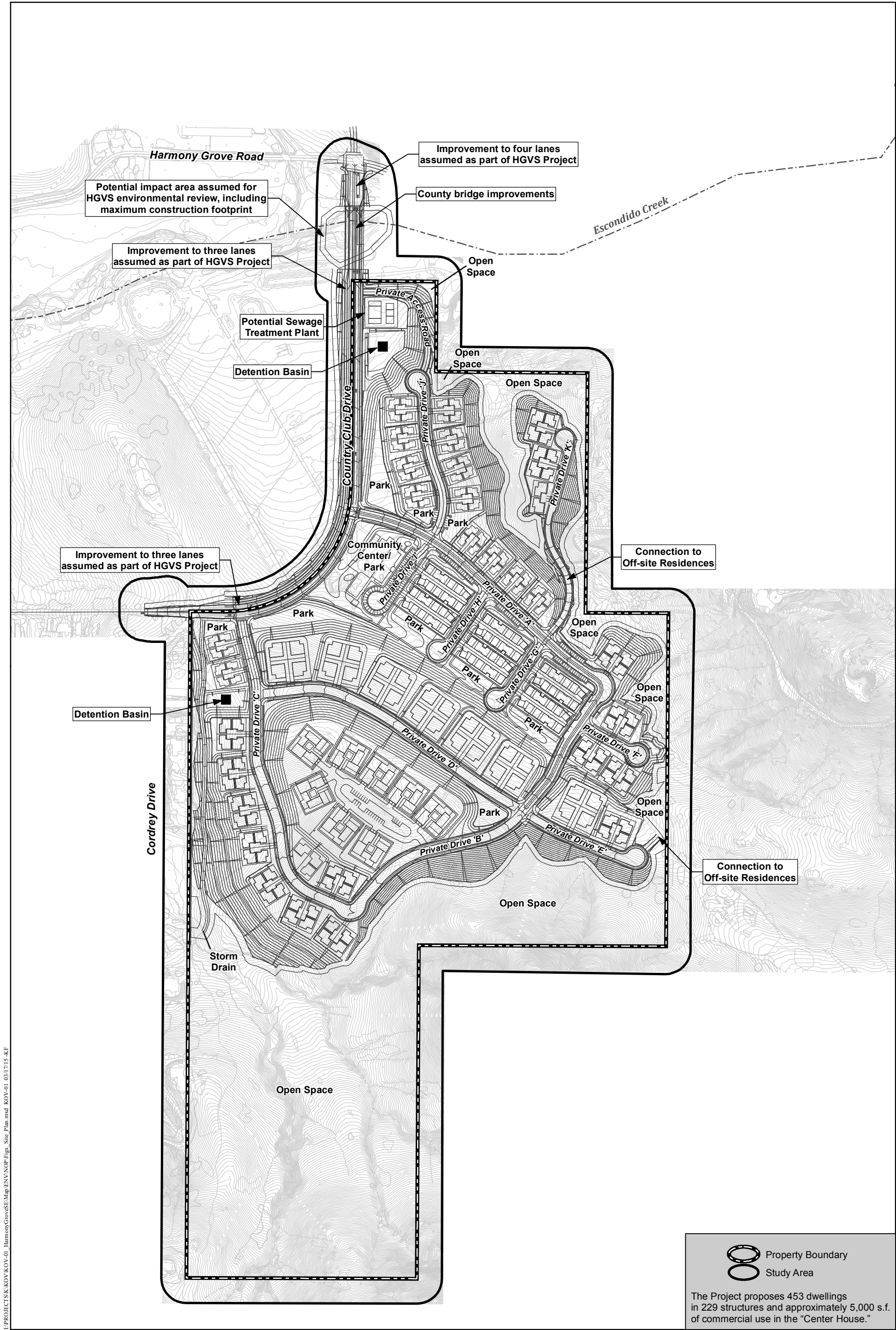
Aesthetics	Air Quality
Biological Resources	Land Use & Planning
Cultural Resources	Noise
Geology & Soils	Transportation & Traffic
Greenhouse Gas Emissions	Utilities & Service Systems
Hazards (wildfire)	Hydrology & Water Quality
Population & Housing	Public Services
Recreation	

PUBLIC SCOPING MEETING:

Consistent with Section 21083.9 of the CEQA Statutes, a public scoping meeting will be held to solicit comments regarding the scope and analysis of the EIR. This meeting will be held on September 16, 2015, 6 p.m. to 7:30 p.m. at the Elfin Forest Firehouse, 20223 Elfin Forest Rd., Elfin Forest, CA 92029.

All comments related to this Notice must be postmarked or received by **September 28, 2015**. Send comments to: San Diego County Planning & Development Services, Attention: Peter Eichar, San Diego County, 5510 Overland Ave., Ste 110, San Diego, CA 92123, or Peter.Eichar@sdcounty.ca.gov.





Site Plan

HARMONY GROVE VILLAGE SOUTH

California Home

Monday, April 10, 2017

[OPR Home](#) > [CEQAnet Home](#) > [CEQAnet Query](#) > Search Results > Document Description**Harmony Grove Village South****SCH Number:** 2015081071**Document Type:** NOP - Notice of Preparation**Project Lead Agency:** San Diego County

Project Description

An EIR will be prepared for the Harmony Grove Village South project. The project application proposes a General Plan Amendment, RPO (steep-slopes) wavier, specific plan, rezone, major use permit and site plan to develop 453 single- and multi-family residential units within 229 structures and a 5,000 sf facility (the Center House) that will support recreation and community uses in addition to commercial space on 111 acres. The Center House could accommodate a coffee shop or cafe as well a small (up to four bed B&B facility) overnight facility. A substandard crossing of Escondido Creek that is subject to flooding will be improved to allow for safe ingress and egress to the subject and surrounding properties. A water treatment/water reclamation facility, park/community garden uses, and recreational trail connections to existing and planned trail facilities open to the public are proposed. The project would result in approximately 36 acres of primarily residential development including streets, and approximately 75 acres of undeveloped uses such as landscaping, gardens or biological open space.

Contact Information**Primary Contact:**

Peter Eichar
San Diego County
858 495 5524
5510 Overland Ave, Suite 110
San Diego, CA 92123

Project Location

County: San Diego
City: Escondido
Region:
Cross Streets: Country Club Drive and Harmony Grove Road
Latitude/Longitude: 33° 5' 41" / 117° 7' 49" [Map](#)
Parcel No: 235-011-06, 09; 238-08, 10
Township: 12S
Range: 2W
Section: 30
Base: SBB&M
Other Location Info:

Proximity To

Highways: I-15
Airports:
Railways:
Waterways: Escondido Creek
Schools:
Land Use: The current Land Use Designation is Semi-Rural 0.5, and the zoning is A70 and RR

Development Type

Residential, Commercial, Recreational (Trails, private and public parks), Waste Treatment: Other (Aeromod)

Local Action

General Plan Amendment, Specific Plan, Site Plan, Rezone, Subdivision, Annexation, Other Action (RPO Waiver)

Project Issues

Aesthetic/Visual, Air Quality, Archaeologic-Historic, Biological Resources, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Sewer Capacity, Traffic/Circulation, Vegetation, Water Quality, Water Supply, Wetland/Riparian, Growth Inducing, Landuse, Cumulative Effects

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Parks and Recreation; Department of Water Resources; **Department of Fish and Wildlife, Region 5**; Department of Housing and Community Development; Office of Emergency Services, California; Native American Heritage Commission; State Lands Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 9

Date Received: 8/27/2015 **Start of Review:** 8/27/2015 **End of Review:** 9/25/2015

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



September 25, 2015

Mr. Peter Eichar
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239
Peter.Eichar@sdcounty.ca.gov

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for Harmony Grove Village South General Plan Amendment, Specific Plan, Rezone, Tentative Map and Major Use Permit (PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, Environmental Log No.: PDS2015-ER-15-08-006, County of San Diego, California (SCH#2015081071)

Dear Mr. Eichar:

The California Department of Fish and Wildlife (Department or "CDFW") has reviewed the above-referenced Notice of Preparation (NOP) for a draft Environmental Impact Report (DEIR) for the Harmony Grove Village South Project (SCH#2015081071) (Project) dated August 27, 2015. Comments on the NOP were requested by September 28, 2015. The comments provided herein are based upon information provided in the NOP and CEQA Initial Study (Environmental Checklist Form) for the DEIR (County of San Diego 2015a) and associated reference materials [including the Helix 2014 biological survey information (Helix 2015)], our knowledge of sensitive and declining vegetation communities, and ongoing regional habitat conservation planning in the County of San Diego (County). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the State of California's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA, Fish and Game Code §2050 *et seq.*) and other sections of the Fish and Game Code. The Department is also responsible for the administration of the Lake and Stream Alteration Agreement Program (Fish and Game Code §1600 *et seq.*) and the Natural Community Conservation Planning (NCCP) program (Fish and Game Code §2800 *et seq.*). The County is a participant in the NCCP program. Currently, the County has an adopted South County Multiple-Species Conservation Program (MSCP), and is actively pursuing its draft North County MSCP (NC-MSCP). The NC-MSCP is a comprehensive habitat conservation planning program that attempts to preserve native habitats for a multitude of sensitive species for which the County, Fish and Wildlife Service, and California Department of Fish and Wildlife entered into a Planning Agreement (County of San Diego 2014a). As noted in the County's EIR scoping letter, one of the primary goals of the NC-MSCP is to conserve 75 percent of natural lands in the Pre-Approved Mitigation Area (PAMA), which includes currently preserved public lands, future public acquisitions and future privately owned preserve lands (County of San Diego 2015b).

The Project proposes development of 453 single- and multi-family residential units and a 5,000 square foot commercial/recreation facility on 111 acres (APNs 235-011-06, 238-021-09, 238-

021-08, 238-021-10); approximately 36 acres would be primarily residential development and 75 acres undeveloped/open space uses, including existing and planned trail facilities. Access would be provided by private roads connecting to Country Club Drive and would include replacing the existing "Arizona" crossing of Escondido Creek with a three-span bridge (250 feet long and approximately 60 feet wide) that would accommodate three lanes, a multi-use trail and sidewalks and a wildlife crossing. The Project includes an on-site water treatment/water reclamation facility (WTWRF), and water utilities (both potable and reclaimed water) would be provided by Rincon del Diablo Municipal Water District (Rincon MWD). The Project would require earthwork consisting of balanced cut and fill of approximately 850,000 cubic yards of material and would be implemented in phases consisting of overall on-site mass grading and existing bridge demolition/construction (first phase), on-site and off-site infrastructure installation (second phase), finish grading lots (third phase), and then "vertical" development of the project (final phase). Project approvals would include a local General Plan Amendment, RPO (steep-slopes) waiver, specific plan, rezone, major use permit, tentative map and site plan. Other public agency approvals required include a Habitat Loss Permit (HLP) from County of San Diego and Section 7 or 10(a) from U.S. Fish and Wildlife Service, and 1602 Streambed Alteration Agreement from CDFW (County of San Diego 2015a).

The 111-acre Project site is located in Harmony Grove Valley, within the San Dieguito Community Planning Area of the County's North County Metropolitan Subregional Plan area, and is located in a semi-rural area that is mostly surrounded by hills and canyons that range from approximately 600 feet to 1,736 feet above mean sea level. Existing residences and a fire station are located immediately to the northeast of the Project site, and the County-approved Harmony Grove Village (HGV) is located immediately to the northwest. The County's Del Dios Highlands Preserve (DDHP) and Escondido Creek Preserve, and Olivenhain Municipal Water District's Elfin Forest Recreational Reserve (EFRR) are located to the south and southeast of the Project site, and existing conserved lands owned by the Escondido Creek Conservancy are located immediately adjacent and to the north. The Project site is also located within Planning Unit 9 (San Marcos-Merriam Mountains Core Area) of the draft NC-MSCP planning area, within the draft PAMA, and is part of one of the few remaining larger blocks of natural habitat west of Interstate 15 in the PAMA in the vicinity of core area. The habitat evaluation mapping for the County's draft NC-MSCP plan indicates that habitats on and adjacent to the project site are "moderate", "high", and "very high" habitat quality, and areas to the immediate north, south, east, and west are also identified as conserved lands and/or PAMA (County of San Diego 2014b). Vegetation on the project site consists of Diegan coastal sage scrub, coastal sage-chaparral transition, granitic southern mixed chaparral, mafic southern mixed chaparral, coast live oak woodland, non-native grassland, drainages (ephemeral streambed) that are tributaries to Escondido Creek, and southern (willow) riparian forest and mule fat scrub within Escondido Creek. Species known to use habitats on or immediately adjacent to the Project site include the federally threatened coastal California gnatcatcher (*Poliioptila californica californica*) and state and federally endangered least Bell's vireo (*Vireo bellii pusillus*) (Helix 2015).

The Department offers the comments and recommendations in the enclosure to assist in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources, and to ensure that the Project is consistent with ongoing regional habitat conservation planning efforts (i.e. that it would not preclude the preserve assembly or prevent the achievement of the biological goals anticipated under the NC-MSCP Subregional Plan). Our main recommendation is that the proposed Project design/footprint be consistent with the NC-MSCP goals, which call for 75 percent conservation of lands designated as PAMA, minimizing impacts to coastal sage

scrub, and maintaining a viable connection for wildlife movement along the northern and eastern portions of the property. The Project currently proposes only 32 percent conservation of PAMA lands, does not provide sufficient on-site conservation to ensure north-south connectivity, and would result in substantial impacts to coastal sage scrub habitat occupied by the California gnatcatcher.

We appreciate the opportunity to comment on this NOP and look forward to further coordination with the County on this Project. If you have questions regarding our letter, please contact Randy Rodriguez at (858) 637-7111 or Randy.Rodriguez@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

Enclosure: (9 pages)

cc: State Clearinghouse, Sacramento
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ENCLOSURE

California Department of Fish and Wildlife Comments and Recommendations: NOP for the Harmony Grove South Project DEIR (SCH#2015081071)

NOP Comments

1. To enable the Department to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, wildlife, and other biological resources, we recommend the following information be included in the DEIR:
 - A. A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas.
 - B. Analyses of a range of feasible alternatives to ensure that alternatives to the proposed Project are fully considered and evaluated. The analyses must include alternatives that avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity, where appropriate. As noted in the County's EIR scoping letter, the Project site is located within the draft North County MSCP and is located within an area designated as the Pre-Approved Mitigation Area (PAMA). A goal of the North County Plan is to conserve 75 percent of natural lands in the PAMA, which includes currently preserved public lands, future public acquisitions and future privately owned preserve lands (County of San Diego 2015b). Currently, the Project proposes 75.9-acres (68 percent) that would be considered impacted and approximately 35-acres (32 percent) as biological open space, with substantial impacts to coastal sage scrub occupied by the California gnatcatcher (Helix 2015). The Department recommends that the proposed Project be designed to be consistent with the draft NC-MSCP in terms of conservation goals for the PAMA (i.e., 75 percent conservation of lands designated as PAMA), and provide a viable connection (consistent with accepted regional standards) along the northern and eastern portions of the property to maximize the conservation of coastal sage scrub and to provide sufficient north-south habitat connectivity from the large core area of upland habitat around Lake Hodges and Del Dios Highlands to the south, continuing through the Project site to Escondido Creek and conserved lands and PAMA located north of the Project site (e.g., conserved lands owned/managed by the Escondido Creek Conservancy and conserved lands on the approved Harmony Grove Project).

We recommend that the draft EIR include an alternative that is consistent with the draft NC-MSCP conservation goals for the PAMA (i.e., 75 percent conservation of lands designated as PAMA). Such a DEIR alternative would substantially minimize project impacts to the draft PAMA and occupied coastal sage scrub, provide for a large, contiguous block of open space in the eastern and northern portion of the property, minimize edge effects to onsite biological open space areas, and maintain connectivity between on- and off-site conserved lands and areas designated as draft PAMA within Planning Unit 9. From a cumulative perspective, we are concerned that the proposed Project, in conjunction with other approved and/or currently proposed projects (e.g., Harmony Grove, Valiano) and extent of private holdings to the immediate east and west of the Project would increase fragmentation of natural habitat, including, but not limited to coastal sage scrub, within Planning Unit 9 of the NC-MSCP.

C. A complete assessment of the flora and fauna within and adjacent to the project area; specifically, the DEIR should include:

- a) Discussions regarding the regional setting, pursuant to CEQA Guidelines, section 15125(c), with special emphasis on resources that are rare or unique to the region that would be affected by the Project. This discussion is critical to an assessment of environmental impacts.
- b) A current inventory of the biological resources (to include rare, threatened, and endangered, and other sensitive species) associated with each habitat type on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive plant, fish, wildlife, reptile, and amphibian species. The Department's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- c) Discussions regarding seasonal variations in use of the project area and vicinity by sensitive species, and acceptable species-specific survey procedures as determined through consultation with the Department. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.

D. A thorough discussion of direct, indirect, and cumulative Project-related impacts expected to adversely affect biological resources. All facets of the Project should be included in this assessment. Specifically, the DEIR should include:

- a) Specific acreages and descriptions of the types of wetlands, coastal sage scrub, and other habitats that would potentially be affected by the proposed Project or project alternatives. Maps and tables should be used to summarize such information.
- b) Detailed discussions, including both qualitative and quantitative analyses, of potential direct effects on listed and other sensitive species (fish, wildlife, plants) and their habitats within the area of impact of the proposed and alternative projects.
- c) Discussions regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP).
- d) Impacts to wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated.
- e) Discussions of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: Project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the Project site.
- f) If applicable, a discussion of the effects of any Project-related dewatering or ground water extraction activities to the water table and the potential resulting impacts on the wetland/riparian habitat, if any, supported by the surface and groundwater.
- g) Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development Project and natural habitats.
- h) A cumulative effects analysis as described under CEQA Guidelines, section 15130, assessing the impacts of the proposed Project in conjunction with past, present, and anticipated future projects, relative to their impacts on native plant communities and wildlife.

- E. A thorough discussion of mitigation measures for adverse Project-related impacts on sensitive plants, animals, and habitats. Specifically, the DEIR should include/address:
- a) Measures to fully avoid and otherwise protect Rare Natural Communities from Project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
 - b) Where avoidance is infeasible, mitigation measures that emphasize minimization of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable (e.g., it would not adequately mitigate the loss of biological functions and values), off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. The Department generally does not encourage the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown these efforts are experimental in nature and do not provide for the long-term viability of the target species.
 - c) Mitigation measures to alleviate indirect Project-related impacts on biological resources, including measures to minimize changes in the hydrologic regimes on site, and means to convey runoff without damaging biological resources, including the morphology of on-site and downstream habitats.
 - d) Where proposed grading or clearing is within 100 feet of proposed biological open space, or otherwise preserved sensitive habitats, a requirement for temporary fencing. Fencing should be placed on the impact side and should result in no vegetation loss within open space. All temporary fencing should be removed only after the conclusion of all grading, clearing, and construction activities.
 - e) A requirement that a qualified biological monitor to be present during initial clearing, grading, and construction in sensitive habitat areas and/or in the vicinity of biological open space areas to ensure that conservation measures associated with resource agency permits and construction documents are performed. The biological monitor should have the authority to halt construction to prevent or avoid take of any listed species and/or to ensure compliance with all avoidance, minimization, and mitigation measures. Any unauthorized impacts or actions not in compliance with the permits and construction documents should be immediately brought to the attention of the Lead Agency and the Department.
 - f) Measures to protect, in perpetuity, the targeted habitat values of proposed preservation and/or restoration areas from direct and indirect negative impacts. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Permanent fencing should be installed between the impact area and biological open space and be designed to minimize intrusion into the sensitive habitats from humans and domestic animals. There should be no gates that would allow access between the development and biological open space. Additional issues that should be addressed include proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, etc.
 - g) Development and implementation of a management and monitoring plan (MMP), including a funding commitment, for any on- and/or off-site biological open space easements, if applicable. An appropriate natural lands management organization, subject to approval by the County and Department, should be identified. The MMP should outline biological resources on the site, provide for monitoring of biological resources, address potential impacts to biological resources, and identify actions to be taken to eliminate or minimize those impacts. A Property Analysis Record (PAR) or comparable method should be completed to determine the amount of funding needed to perform start-up activities and for the perpetual management, maintenance, and monitoring of the biological conservation easement areas by the natural lands management organization. It should be demonstrated that the

proposed funding mechanism would ensure that adequate funds would be available initially and on an annual basis to implement the MMP. The natural lands management organization should submit a draft MMP, PAR results, and proposed funding mechanism to the Department for review and approval prior to initiating construction activities; the final plan should be submitted to the Department and the funds for implementing the MMP transferred within 90 days of receiving approval of the draft plan.

2. The Department recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1 - September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
3. As stated above, the proposed Project is located primarily within the PAMA, within the San Marcos-Merriam Mountains Core Area (Planning Unit 9) and is part of a larger block of natural habitat (typically 500 acres or more) that supports a viable population of multiple wildlife species located west of Interstate 15 (I-15) in the PAMA. The draft NC-MSCP plan anticipates that approximately 75 percent of lands designated as PAMA would be conserved with 25 percent utilized for development and anticipates the following conservation goals for the San Marcos-Merriam Mountains Core Area (Planning Unit 9) (County of San Diego, 2014b):
 - A. Conserve oak woodlands, coastal sage scrub (particularly in Twin Oaks) to maintain populations and connectivity of coastal California gnatcatcher and other coastal sage scrub-dependent species, and chaparral on mafic or gabbro soils that support sensitive plant species, such as chaparral beargrass and Parry's tetradlea, San Diego thornmint (particularly in San Marcos Mountains), or California adonis;
 - B. Ensure that a core community of coastal California gnatcatcher and other coastal sage scrub-dependent species remains in the coastal sage scrub block in Twin Oaks;
 - C. Conserve the north-south connectivity of coastal California gnatcatcher habitat along I-15 between the Riverside County line and the City of Escondido. Maintain the east-west connectivity of natural habitats on either side of I-15 for dispersal of coastal sage scrub community birds;
 - D. Conserve the riparian and upland habitats of Gopher Canyon Creek for water quality and sensitive species, such as southwestern pond turtle and least Bell's vireo; and,
 - E. Ensure the San Diego thornmint population in the Palisades open space preserve is maintained and enhanced, if practicable.

Based on the NOP and CEQA Initial Study (Environmental Checklist Form) and supporting information (County of San Diego, 2015a and Helix, 2015), the current project proposal would only provide a 32 percent conservation and 68 percent development ratio, which would be substantially less than and not consistent with the 75 percent average reserve assembly target for lands designated as PAMA in the NC-MSCP and would fragment a larger block of habitat that is planned to connect designated preserve areas with high value habitat within the NC-MSCP PAMA, including areas currently conserved to mitigate impacts to California gnatcatchers and their habitat. Fragmentation reduces habitat quality and promotes increased levels of nest predation and brood parasitism, and ultimately, increased rates of local extinction (Wilcove 1985, Rolstad 1991, Saunders *et al.* 1991, Soulé *et al.* 1988). Connectivity among habitat reserve areas (i.e., connectivity among gnatcatcher habitat within the NC-MSCP PAMA) is essential for long-term maintenance of the viability of California gnatcatchers in this area. Maintaining connectivity among these patches of habitat serves to: (1) allow exchange of genetic material among populations; (2) allow recolonization of habitat patches from which gnatcatchers have been extirpated; and (3) allow relatively safe travel for gnatcatchers moving from one area to another. Fragmentation of habitat within core habitat areas and the narrowing of connections among blocks of remaining habitat for gnatcatchers are expected to reduce the function and value of these areas.

The DEIR should evaluate direct and indirect impacts that the proposed development would have on the planned San Marcos-Merriam Mountains Core Area linkage and NC-MSCP planning unit goals, and in particular consider adverse effects on north-south and east-west wildlife movement through/across the site. The DEIR should analyze potential impacts to wildlife movement (including gnatcatchers, mammals and herpetofauna), loss of and fragmentation to habitat patches/blocks on-site and implications to adjoining habitat, and the narrowing of movement corridors in relation to existing conditions and topography.

4. The Department recommends that a 100-foot buffer from the riparian habitat in the major drainage of Escondido Creek be incorporated into the Project. This habitat is expected, either currently or in time, to support sensitive riparian species such as the endangered least Bell's vireo. We further recommend that any encroachment (necessitated by site topography) from on-site trails be avoided or extremely limited, and not approach any closer than 50-feet to riparian/wetland habitat. The DEIR should include a map showing the location of all proposed trails.
5. If the Project includes parks and/or fuel modification zones within the open space acreage, please be aware that these uses would be considered fully impacted by the Department and cannot be included in biological open space proposed for conservation to offset impacts to sensitive resources and must be mitigated appropriately. The DEIR should clearly differentiate between biological open space that would be used as mitigation to offset Project impacts (natural open space) and open space (i.e., parks and fuel modification zones) that would be routinely maintained/impacted.
6. The Section 10 of the CEQA Initial Study (Environmental Checklist Form) indicates that the Project would require issuance of a County Habitat Loss Permit (HLP, Ordinance Nos. 8365, 8380, 8608, 8846, 9457, and 9671), which implements the interim 4(d) rule of the federal Endangered Species Act and the state Natural Community Conservation Planning (NCCP) Process Guidelines for loss of coastal sage scrub habitat during preparation of a NCCP-HCP.

To approve an interim habitat loss application, the local agency must make the following findings:

- A. The proposed habitat loss is consistent with the interim loss criteria in the Conservation Guidelines and with any subregional process if established by the subregion;
- B. The habitat loss does not cumulatively exceed the 5% guideline;
- C. The habitat loss will not preclude connectivity between areas of high habitat values;
- D. The habitat loss will not preclude or prevent the preparation of the subregional NCCP (e.g., the loss would not foreclose future reserve planning options);
- E. The habitat loss has been minimized and mitigated to the maximum extent practicable;
- F. The habitat loss will not appreciably reduce the likelihood of the survival and recovery of listed species in the wild; and,
- G. The habitat loss is incidental to otherwise lawful activities.

The NC-MSCP Planning Agreement also establishes guidelines for interim projects while the Plan is being completed (Section 6.6, Interim Project Processing Interim Review Process and Exhibit B). The Interim Review guidelines identify that where a project will not affect coastal sage scrub but will negatively affect (a) biological resources in areas mapped as "high value" and "very high value" based on the County's habitat evaluation models that utilize the best available information at the time, (b) areas mapped as "moderate" or "low" value that may be important for preserve assembly, and/or (c) proposed Covered Species or their habitat based on current biological surveys, the NCCP/4(d) findings shall be considered and preserve design principles shall be applied to the project including the following:

- A. On-site open space should provide a long-term biological benefit;
- B. On-site open space must protect habitat of equal or greater value as that being impacted. No isolated pockets of open space should be used for mitigation credit;
- C. Separate lots should be used whenever possible for on-site open space to help protect the biological value of the preserved areas;
- D. On-site open space shall contribute to regional conservation efforts;
- E. Open space design, to the extent known, should not reduce the biological diversity found on the site;
- F. Open space design shall maintain habitat connectivity between areas of high quality habitat;
- G. The most sensitive resources shall be protected to maximize long-term viability; and,
- H. Edge effects and habitat fragmentation shall be minimized by maximizing the surface area to perimeter ratio, preserving large blocks of contiguous open space. Edge effects shall be further minimized by establishing buffers, providing fencing and/or permanent signs, and limiting trails and/or lighting.

The DEIR should include sufficient information and analysis to demonstrate how the project is consistent with the preliminary conservation objectives of the NC-MSCP (including the planning units goals for the San Marcos-Merriam Mountains Core Area, see Comment No. 3) and the Planning Agreement Exhibit B guidelines for interim projects and how it would meet the NCCP/4(d) findings required for the County to issue a HLP for impacts to coastal sage scrub (which are subject to Department and United States Fish and Wildlife Service concurrence).

- 7. The proposed Project is located adjacent to various lands that have been or are planned to be conserved for biological resources, including lands owned by the Escondido Creek Conservancy, the County of San Diego (Del Dios Highlands Preserve and Escondido Creek Preserve), Olivenhain Municipal Water District (Elfin Forest Recreational Reserve) and conserved lands at the approved and under construction Harmony Grove Village development. The DEIR should evaluate the direct and cumulative effects that the proposed development would have on the adjacent existing and proposed conservation. The analysis should include effects on these lands from the proposed Project, including direct and indirect impacts from: (a) increased public use of these open space areas from

the Project's population; (b) lighting; (c) noise; (e) drainage; (f) landscaping and introduced vegetation, etc.

8. All plans for restoration/revegetation associated with the Project should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.
9. The Department is concerned about the potential direct and indirect effects to biological resources associated with the construction of trails in areas proposed for designation as open space on site. We recommend that trails in open space be located to not bisect intact areas and instead be placed along the perimeter or edge of open space areas. The following information should be included in the DEIR regarding any proposed trail: an aerial photograph with an overlay of the proposed alignment of the trail in relation to designated or proposed open space; specifications of the trail type and design; measures to avoid/minimize impacts related to users straying off-trail and/or unauthorized activities (e.g., vehicles); and a discussion of how the proposed location and use of the trail would be consistent with the County's draft NC-MSCP.
10. To increase potential habitat and functionality of on-site wildlife corridors, we recommend that any Project-graded slopes and fuel clearing areas requiring replanting be planted with compatible, low-fuel natives (e.g., cacti and other succulents) to minimize the potential for invasive species to spread into the proposed on-site mitigation/open space areas and into adjacent natural lands.
11. The County should ensure that all development-related landscaping proposed adjacent to on- or off-site habitat does not include exotic plant species that may be invasive to native habitats. Exotic species should be removed and replaced with native or non-invasive exotic species based on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" list that can be obtained from Cal-IPC's web site at <http://www.cal-ipc.org>. This list includes such species as pampas grass, fountain grass, myoporum, black locust, capeweed, tree of heaven, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. In addition, landscaping should not use plants that require intensive irrigation, fertilizers, or pesticides adjacent to preserve areas and water runoff from landscaped areas should be directed away from the biological conservation easement area and contained and/or treated within the development footprint. The applicant should submit a draft list of species to be included in the landscaping to the Department for approval at least 60 days prior to initiating Project impacts. Additionally, the applicant should also submit to the Agencies the final list of species to be included in the landscaping within 30 days of receiving approval of the draft list of species.
12. Based on initial biological surveys for the Project (Helix 2015), the property includes the following habitats that contain sensitive plant species and/or support sensitive animal species: Diegan coastal sage scrub, coastal sage-chaparral transition, granitic southern mixed chaparral, mafic southern mixed chaparral, coast live oak woodland, and non-native grassland. In addition, southern (willow) riparian forest and mule fat scrub exist where Project improvements would improve the existing "Arizona" crossing in Escondido Creek. Species known to use these habitats within the on- and off-site Project impacts areas include a pair of California gnatcatcher (Federally listed as Threatened, a State Species of Special Concern, and County Group 1 animal) and least Bell's vireo within Escondido Creek (Federally listed as Endangered, State listed as Endangered, and a County Group 1 animal).

The NC-MSCP is still in-progress, and is expected to be completed in 2017. Until the NC-MSCP is completed and permit issued, the Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options [Fish and Game Code §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

13. The NOP and CEQA Initial Study (Environmental Checklist Form) (County of San Diego 2015a) indicate that the site contains a number of drainages (ephemeral streambed) that bisect the project site and are tributaries to Escondido Creek. On-site construction could result in direct or indirect impacts to these ephemeral streambeds (and associated coast live oak woodland), as well as to southern (willow) riparian forest and mule fat scrub habitats associated with Escondido Creek, from the replacement of the existing Arizona crossing with the proposed three-span bridge.

The Department has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. The project area supports aquatic, riparian, and wetland habitats. The DEIR should include a jurisdictional delineation of the creeks/drainages and their associated riparian habitats. The delineation should be conducted pursuant to the U.S. Fish and Wildlife Service wetland definition adopted by the Department (Cowardin *et al.* 1979). Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the City's DEIR for the project. We recommend that all wetlands and watercourses on-site, whether ephemeral, intermittent or perennial, should be retained and provided with substantial setbacks to preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife and plant populations. Moreover, to minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of an SAA.¹

¹ A notification package for a SAA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

REFERENCES

- Atwood, J. L. 1990. Status review of the California gnatcatcher (*Poliioptila californica californica*). Unpublished technical report, Manomet Bird Observatory, Manomet, Massachusetts. 79 pp.
- County of San Diego. 1997. South County Multiple Species Conservation Program. Section 4.2.3 (Linkages) - Goals and Criteria for Linkages and Corridors, Page 4-9 and Biological Mitigation Ordinance (2010) - Attachment H (Design Criteria for Linkages and Corridors).
- County of San Diego. 2014a. Planning Agreement By and Among the County of San Diego, the California Department of Fish and Wildlife, and the United States Fish and Wildlife Office Regarding the North and East County Multiple Species Conservation Plans: Natural Community Conservation Program Plans and Habitat Conservation Plans. November 15, 2013. Revised and Amended May 12, 2014.
- County of San Diego, 2014b. Preliminary Draft North County MSCP Plan: Volume I Chapter 5: Preserve Assembly. Pages 47 and 49. September 2014.
- County of San Diego, 2015a. Notice of Preparation and CEQA Initial Study (Environmental Checklist Form) for the Harmony Grove Village South General Plan Amendment, Specific Plan, Rezone, Tentative Map and Major Use Permit (PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, Environmental Log No.: PDS2015-ER-15-08-006, County of San Diego, California (SCH#2015081071). Prepared by the San Diego County Planning & Development Services Department, August 27, 2015.
- County of San Diego, 2015b. Harmony Grove Village South Scoping Letter, Page 5. To David Kovach RCS Harmony Partners, LLC 2305 Historic Decatur Rd, Ste. 100 San Diego, CA 92106. Prepared by County of San Diego Planning & Development Services. 5510 Overland Avenue, Suite 310. San Diego, CA 92123. Dated July 16, 2015. RECORD ID: PDS2015-GPA-15-002; PDS2015-SP-15-002; PDS2015-TM-5600; PDS2015- REZ-15-003; PDS2015-MUP-15-008; PDS2015-ER-15-08-006. Dated July 16, 2015.
- Cowardin, Lewis M., et al. 1979. Classification of wetlands and deepwater habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.
- ERC Environmental and Energy Services (ERCE) (Ogden). 1990. Phase I report, Amber Ridge California gnatcatcher study. Prepared for Weingarten, Siegel, Fletcher Group, Inc. April 1990. 26 pp.
- Helix, 2015. Biological Technical Report for the Harmony Grove Village South Project. Prepared by Helix Environmental Planning, Inc. for David Kovach, RCS Harmony Partners, LLC. Dated July 22, 2015.
- Rolstad, J. 1991. Consequences of forest fragmentation for the dynamics of bird populations: conceptual issues and the evidence. M. E. Gilpin and I. Hanski (eds.), Metapopulation dynamics: empirical and theoretical investigations Academic Press, London, UK. Pp. 149-163.
- SANDAG, 2003. Final MHCP Plan volume I Prepared for the Multiple Habitat Conservation Program. Administered by SANDAG for the Cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach and Vista. Prepared by AMEC Earth & Environmental, Inc., Conservation Biology Institute, Onaka Planning & Economics and The Rick Alexander Company. March 2003.
- Saunders, D. A., R. J. Hobbs, and C. R. Margules. 1991. Biological consequences of ecosystem fragmentation: A review. Conservation Biology Vol. 5, No. 1. Pp. 18-32. Soulé, M. E., D. T. Bolger, A. C. Roberts, R. Sauvajot, J. Wright, M. Soricce, and S. Hill. 1988. Reconstructed dynamics of rapid extinctions of chaparral-requiring birds in urban habitat islands. Conservation Biology. Vol. 2. Pp. 75-92.
- Sproul, F., T. Keeler-Wolf, P. Gordon-Reedy, J. Dunn, A. Klein, and K. Harper. 2011. Vegetation classification manual for Western San Diego County. Prepared by AECOM, California Department of Fish and Game, Vegetation Classification and Mapping Program, and Conservation Biology Institute. Prepared for San Diego Association of Governments. Five sections + appendices and figures.
- Wilcove, D.S. 1985. Nest predation in forest tracts and the decline of migratory songbirds. Ecology. Vol. 66. Pp. 1211-1214.

DEPARTMENT OF TRANSPORTATION

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September 2, 2015

11-SD-15
PM 30.09
Harmony Grove Village South
NOP

Mr. Peter Eichler
County of San Diego
Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Dear Mr. Eichler:

The California Department of Transportation (Caltrans) has received the Notice of Preparation (NOP) dated, August 27, 2015, for the Harmony Grove Village South Project located near Interstate 15 (I-15) at 9th Avenue. Caltrans has the following comments:

Please provide a copy of the Traffic Impact Study when available for review.

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures. The study should use as a guideline the Caltrans Guide for the Preparation of Traffic Impact Studies. Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide. www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.

A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacities. A focused analysis may also be necessary if there is an increased risk of a potential traffic accident.

All freeway entrance and exit ramps where a proposed project will add a significant number of peak-hour trips that may cause any traffic queues to exceed storage capacities should be analyzed. If ramp metering is to occur, a ramp queue analysis for all nearby Caltrans metered on-ramps is required to identify the delay to motorists using the on-ramps and the storage necessary to accommodate the queuing. The effects of ramp metering should be analyzed in the traffic study. Ramp meter delays above 15 minutes are considered excessive.

The data used in the TIS should not be more than 2 years old.

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

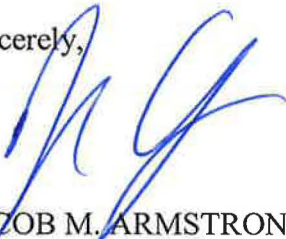
Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy; therefore, please refer to the policy for more information and requirements.

<http://www.dot.ca.gov/hq/traffops/signtech/signdel/policy/13-02.pdf>

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

If you have any questions on the comments Caltrans has provided, please contact Roy Abboud of the Development Review Branch at (619) 688-6968 or roy.abboud@dot.ca.gov.

Sincerely,



JACOB M. ARMSTRONG, Chief
Development Review Branch



20223 Elfin Forest Road
Elfin Forest, CA 92029

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JP Theberge, Vice Chair
Jan Denny, Secretary
Nancy Goodrich, Treasurer
Teri Bair
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Angelique Hartman
Betsy Keithley
Dave Stainton
Eric Anderson, Member At large

September 24, 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

Dear Peter,

As the draftees of the Elfin Forest Harmony Grove Community plan, which this project is subject to, we thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Harmony Grove Village South Project.

Project Description

There are several potential impacts within the project description section, which need to be fully analyzed in the EIR. The project property is located:

- outside of the existing sewer service district recognized by LAFCO, yet claims through LU 1.4 to be part of an existing Village;
- beyond the Village Limit Line established and recognized by the County's General Plan, outside of which no VR designations are permitted;
- within the rural periphery buffer for the Harmony Grove Village project, which destroys the buffering functionality of the Community Development Model for the existing village;

If the applicant is claiming being part of an existing Village, which does implement a CDM throughout, the impact and logic of not following the Community Development Pattern of the entire Village needs to be studied, not only as to whether density should logically follow the least dense pattern on the outskirts of the CDM, where the project is located, but also whether it necessitates a change to this important General Plan Policy, and the subsequent impact throughout the county.

Further, the HGVS project design itself does not include a rural buffer with larger lots and horse keeping properties, as does the existing HG Village Plan. The existing Community Development Model, in compliance with LEED-ND criteria, negotiated by the community in good faith, included a village design that encouraged pedestrian activity with urban densities less than ¼ mile in radius from the core of the existing village. This proposed GPA would add urban densities well beyond ¼ mile and up to over 1 mile from the existing village core and outside of the Village Limit Line and the sewer service boundary, transform buffer areas between the urban density and existing rural residences into high density residential, and disturb the carefully crafted urban-rural balance.

A description of the inclusion of this project into the historic, over 120-year-old Harmony Grove rural community and its long-standing representative citizen's group, the Elfin Forest Harmony Grove Town Council, should be added to the project description. In addition, 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 the impact to every planning area in the County. From an overall planning perspective, this backfill clustered housing project would result in checkerboard development, which contravenes the adopted goals and maps of the General Plan (see Guiding Principle 2, p 2-7 to 2-9; Guiding Principle 10, p. 2-14 to 2-15)).

Land Use and Planning

LU 1.4 vs LU 1.2:

As demonstrated in the letter sent on our behalf by Shute, Mihaly and Weinberger dated June 25, 2015 and attached as part of our comments, the project is not adjacent to an existing village and therefore cannot claim an expansion under LU 1.4. 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. For example, GP Policy LU 6.7 requires wildlife corridors to be established in "contiguous" open spaces. How would this affect the Multiple Species Conservation Program if this interpretation of "contiguous" would allow gaps between two or more corridors merely "near" each other? The planning impacts and legal costs of determining and supporting an arbitrary definition of "near" for the entire County wide GP should be studied.

If LU 1.4 does not pertain to this project, 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.

Consistency with Harmony Grove Community plan:

The proposed project destroys the existing and essential buffering function of the project site itself, which was carefully considered as part of the adoption of the Harmony Grove Village

project. This impact needs to be fully analyzed. In addition, the EIR needs to specifically address consistency with adopted Community Plan policies such as septic only outside the Village Limit line, 1 acre minimum lot size, large animal keeping, and the like.

Public Services.

Fire and Emergency Services

Current and future residents alike could be facing a perilous situation during an emergency such as a mass evacuation due to a wildfire or an earthquake. The project as currently proposed has only one exit onto Country Club Drive. This design of one egress would compromise safety during evacuations as Country Club Drive, which dead ends to the east, serves as the only exit route for existing residents beyond the project area. The EIR needs to fully analyze evacuation scenarios - including existing residents and their large animal livestock - with the most recent fire behavior data available, including the 2014 Coco's fire.

The project area is adjacent to Standard Pacific's temporary Construction Trailer and lay down areas; the open spaces around these structures burned from the Southern terminus of Country Club Drive to Harmony Grove Road during the 2014 Coco's fire. This area of Harmony Grove lost more than 30 homes and several out buildings only a few hundred feet from the proposed project location.

Road Improvements

Improving the current roads may not be sufficient to allow the existing residents with their horse trailers to evacuate in time once the HGV, Valiano, and HGVS projects are fully built out, especially with the Citracado Parkway extension delayed, and a doubling of the Sprinter line schedule, which already creates a bottleneck for evacuation to the North. The EIR should study worst case conditions at full build-out without Citracado Parkway to evaluate whether current residents and future residents of HGV, Valiano, and HGVS could safely evacuate on Country Club and/or Harmony Grove Road.

The most useful analysis would determine the maximum number of dwellings in the valley to allow for safe egress in case of emergency evacuation given the number of existing residents. Prevailing winds and past fire emergencies patterns, and prevalence of substandard private roads should be modeled to determine the wisdom of adding several thousand people in a bottlenecked valley already at the wildland-urban interface.

The possibility for fatalities due to the entrapment of people and animals on these rural roads, and possibly the nearby local highways should be studied as part of this project EIR. Please note that in a wildfire roadway entrapment scenario, large animals cannot be removed from trailers when there are stationary vehicles behind the trailers prohibiting the lowering of the rear exit ramps. Horse trailers are particularly susceptible to catching fire by windblown embers because they have large open windows and are filled with dry wood shavings. Thus, tragically, hundreds of horses could be trapped in their trailers and killed by fire, or let loose and die if roadways are congested or blocked during evacuations (as seen in the Valley Fire in northern CA, that is still burning as of this writing – where picture below was taken)



Recreation.

This project does not include any public parks. The residents of the 453 units will no doubt use the community's only public park in Harmony Grove Village, which was designed to be a meeting place for village and rural neighbors. The impact on this park by a GPA of the magnitude proposed with 453 neighboring homes should be studied and mitigated within the community. Unlike all existing or approved dwellings in the community plan area, a majority of proposed dwellings do not include private yards to recreate; the EIR needs to fully analyze the impact of a) use of existing public recreation areas at a higher rate by these proposed residents, including impact on GHG and VMT to get to said recreation, and b) the potential impact on existing residents' recreational amenities such as large animal keeping of adding apartment dwelling neighbors who may object to odor or other vectors currently existing within the community.

Transportation and Traffic.

This Town Council Board worked diligently with County staff and applicant to craft a compromise to mitigate the project traffic impacts of HGV. This mitigation measure was the downgrading of rural roads surrounding the project to minimize impact to existing residents. Country Club Drive (designed to handle only 4,500 ADTs) and Kauana Loa Drive are non Mobility Element roads. They are now at risk of being added back to the Mobility Element Plan due to the added project traffic. A GPA of the magnitude proposed, especially when combined with the change in planned improvements in Escondido, could jeopardize years of good faith collaboration, and result in these roads needing to be reclassified to accommodate the additional traffic impact.

In addition, 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. This analysis needs to extend to the private roads in Elfin Forest, which currently serve as cut-through routes to traffic from Escondido and the project area. Private property

owners pay to maintain these roads with no mean to restrict access to deeded easement owners exclusively, and any added density in Harmony Grove will result in added traffic impact on these private roads. The EIR needs to fully analyze the additional financial burden to private property owners from project use and consider adequate mitigation.

The traffic impact on intersection of Elfin Forest Road and Twin Oaks Road need to be analyzed since it is the first intersection to the West of the project; analysis needs to include emergency evacuation conditions for traffic impact, noting that in last local emergency (Coco's fire) traffic at that intersection was at a standstill with flames overhead on the hills. Impact of project traffic on the ability of other residents to evacuate via the West needs to be fully studied.

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, a Federally-funded project years in the planning that the applicant is touting as a project benefit, but which the community believes will occur independently of this project.

Agriculture and Forestry Resources.

The Harmony Grove Community Plan calls for encouraging family owned farms; the impact of removing the agricultural land and in its place putting high density clustered units should be studied.

Aesthetics

The proposed project calls for a mix of structures including multi-family and single family homes. Structures will range from one and half stories high to three and half stories high, the maximum height being 64 feet. This is more than double the height of homes in the neighboring vicinity, including homes in Harmony Grove Village. This is in direct conflict with the character of the community, which includes one and two story single family homes on large lots; large animal facilities on residential properties; no walled developments, and no gated communities.

The aesthetics impacts to the existing community include the obstruction of view of the rolling hills, the ridgeline along the western edge of Harmony Grove which is a locally important historic visual resource called the "Lady of the Valley," and it will also greatly impact the scenic vistas from Harmony Grove Road, part of the scenic County Highway System. The amount of light and glare from such a large clustered development would jeopardize the community's dark skies policy and should be considered a potentially significant impact. No amount of disguising large apartment blocks as "granaries" can mitigate for the aesthetic impact of bulk and scale completely out of harmony with any of the surrounding properties south of Country Club Drive.

Further, the EIR should examine the aesthetics impacts of losing the Community Development Pattern, which aims to bring visual harmony between a village and its surroundings.

Biological Resources

This project is located within the draft North County MSCP and is located within an area designated as the Pre-approved Mitigation Area (PAMA). The goal of this plan is to conserve 75% of natural lands in the PAMA. The applicant is proposing that 75 acres of the 111 acre site

will be dedicated to landscaping, gardens, or biological open space. This doesn't appear to meet the criteria of conserving 75% of the natural lands on the project site, which would be 83.25 acres. This should be studied closely for accuracy of land use (natural land, not landscaping and gardens) and the appropriate conservation measures as required by PAMA.

There are a number of species on the project site that are listed as State and/or Federally Endangered and/or Threatened. CAGN and LBV have been documented within the project site. In addition, Mammal trapping surveys should be done because the area has been in the historical range for the Stephens Kangaroo Rat, and the northwestern pocket mouse.

Because the State of California has been in a drought pattern for several years, rare plant surveys are likely inaccurate. Rare plant Surveys should be performed after an adequate year for rainfall, and because there are clay soils present on site, a vernal pools survey should also be considered.

The non native grasslands that are present onsite are an important local resource to a number of protected avian species and potentially sensitive reptilian and mammalian species that rely on this resource for foraging, burrowing, and nesting. Because the area has been untouched for a long time, there are a number of native plants that have reestablished in the area, making rare plants surveys in this area necessary as well.

There are a number of bat species recorded in the area. Because the project site has the Escondido Creek, large rock formations nearby, and open fields providing for ideal bat foraging, surveys should be conducted to determine what protected bat species would be impacted by this project.

The proposed project would impede wildlife access to and from areas onsite and offsite, and create hazardous environment for wildlife with a suburban/wildland interface that would be impossible to balance. A development of this size would bring in domestic cats and dogs, subject the wildlife to further impacts by predation, disease, poison, roadkill, and other stresses that need to be studied in the EIR.

Cultural Resources:

Harmony Grove is the oldest of the San Dieguito communities, named by the Spiritualist Association that incorporated there in 1896. Luiseno and Diegueno occupation is evident. Prehistoric resources in the surrounding areas include petroglyphs, pictographs, some habitation sites, bedrock milling sites, a lithic scatter and, there are several buildings that appear on the 1889/1891 San Luis Rey 15' topographic map, and some of these are still standing. For example the remains of an adobe structure stand near Country Club Drive and Cordrey Lane on the project site.

Greenhouse Gas Emissions

How will the project adequately mitigate for potentially significant impacts, when there are no adopted mitigation measures at this time?

“The new Climate Action Plan (CAP) for the County of San Diego will be a comprehensive Plan that will outline the specific activities that the County will undertake to reduce Greenhouse Gas

(GHG) emissions in the unincorporated communities of San Diego County. The CAP will also aid the County meet State mandated GHG reduction targets. The CAP will focus on activities that can achieve the greatest GHG emission reductions in the most technologically feasible and cost-effective manner. Project completion is anticipated in the Fall of 2017.”

Project Alternatives

We respectfully request as one of the alternatives analyzed a project consistent with the Harmony Grove Community Plan, at the original density established by the Community Development Model agreed upon by the community and the County (~25 units) and embedded in the Staff Land Use Map during the General Plan Update process. This Town Council Board is on record advocating against the 176% increase in density the site received as part of the Property Specific Requests, which was politically motivated, completely inappropriate for the site, and potentially subject to reevaluation.

Thank you for the opportunity to comment.

Angelique Hartman



Chair, Harmony Grove Meadows Committee
Elfin Forest/Harmony Grove Town Council

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& WEINBERGER LLP

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June 25 2015

Via E-Mail and U.S. Mail

Marisa Smith
County of San Diego Planning and
Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Re: Harmony Grove Village South's Inconsistency With the General
Plan and Community Plan

Dear Ms. Smith:

This firm represents the Elfin Forest Harmony Grove Town Council in matters related to the County's consideration of the proposed Harmony Grove Village South project ("Project" or "HGVS"). I have reviewed correspondence between Ann Moore, counsel for Kovach, and David Sibbet, in the County's Planning Department, dated March 20, 2015. ("Moore letter"). This letter and an attached matrix describe why the Project applicant believes the Project is consistent with the County's General Plan and the Elfin Forest and Harmony Grove, San Dieguito Community Plan ("Community Plan"). After reviewing that letter, as well as relevant General Plan and Community Plan policies and maps, it is clear that 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.

Among other inconsistencies, the Project would violate the County's restrictions on expanding existing rural villages. The Project does not meet the General Plan's strict criteria for allowing village expansions, and must be disapproved on this basis alone. In addition, the Project would irrevocably alter the community's rural atmosphere by introducing urban-style development, with resulting noise, traffic, and other impacts. The Community Plan specifically foresaw that developers would want to upzone properties and build urban and suburban developments in the community, and it

explicitly restricted their ability to do so. Among other limitations, the Community Plan requires that new development utilize on-site septic systems, which helps maintain the large-lot, rural atmosphere. It also forbids the County from approving new developments that will cause urban residences to greatly outnumber rural residences in the community, thereby drowning out the all-important rural voice. The Project would clearly violate both of these policies.

Additionally, the Project fails to comply with County fire standards that require two egress routes. The County should not exempt the Project from this crucial requirement. Nor is it clear that the County may rely on CalFire to provide firefighting services to the Project, as I understand it may wish to do. CalFire is obligated by state law to make sure that its infrastructure and funding decisions do not support unsafe, sprawl development such as HGVS. Attached to this letter is a letter my firm is sending to CalFire to ask it for information on whether it may facilitate developments such as this one by providing fire services to it. See Exhibit 1.

Just four years ago, the County spent \$18 million in taxpayer dollars updating its General Plan and the Community Plan. This years-long process, which involved countless hours of community meetings, culminated in a General Plan and Community Plan that carefully selected the areas where the Harmony Grove community would grow while assiduously protecting the rural character of the remaining land. The Harmony Grove community worked hard to develop the Community Plan and has worked for years to enforce it. They were willing to accept their share of growth in the community, in the form of Harmony Grove Village. However, they made sure that the Community Plan contained enforceable restrictions that bar the County from approving other high-density, urban-style developments such as HGVS.

Now a developer is asking the County to ignore the Community Plan that the County and community worked so hard on. The County may not do this. Rather, it must uphold the clear, mandatory policies of the General Plan and Community Plan that protect the Harmony Grove community from creeping urbanization and developments such as HGVS. In short, the proposed Project is irrevocably inconsistent with the General Plan and Community Plan and the County must reject it.

I. The Project Must Comply With the County's General Plan

The State Planning and Zoning Law (Gov't Code § 65000 et seq.) requires that development decisions be consistent with the jurisdiction's general plan. As reiterated by the courts, "[u]nder state law, the propriety of virtually any local decision affecting land

use and development depends upon consistency with the applicable general plan and its elements.” *Resource Defense Fund v. County of Santa Cruz* (1982) 133 Cal.App.3d 800, 806. Accordingly, “[t]he consistency doctrine [is] the linchpin of California’s land use and development laws; it is the principle which infuses the concept of planned growth with the force of law.” *Families Unafraid to Uphold Rural El Dorado County v. Board of Supervisors* (“FUTURE”) (1998) 62 Cal.App.4th 1332, 1336. See also *Leshar Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 540 (general plans and community plans act as a “constitution” for future development).

A proposed project need not present an “outright conflict” with a general plan provision to be considered inconsistent; the determining question is instead whether the project “is compatible with and will not frustrate the General Plan’s goals and policies.” *Napa Citizens for Honest Gov’t v. Napa County* (2001) 91 Cal.App.4th 342, 379. In addition, courts have invalidated project approvals that were inconsistent with fundamental, mandatory, and clear general plan policies, regardless of whether the projects were consistent with other general plan policies. *FUTURE*, 62 Cal.App.4th at 1341-42; *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783.

Accordingly, courts give some deference to jurisdictions in interpreting their general plans, but do not allow jurisdictions to ignore inconsistencies with clear, mandatory general plan provisions. Nor may jurisdictions approve projects that will frustrate the general plan’s clear goals. As the state Supreme Court recently opined in an analogous context, “although land use regulations are generally entitled to deference, “judicial deference is not judicial abdication . . . There must be a reasonable basis in fact, not in fancy, to support the legislative determination.” *California Building Industry Association v. City of San Jose* (June 15, 2015), Case No. S212072.

II. The Proposed Project Is Inconsistent With General Plan Policy LU-1.4 Regarding Village Expansion.

One of the General Plan’s fundamental tenets is that it promotes compact development in existing communities that will reduce the loss of farmland and wildlife habitat, reduce greenhouse gas emissions, and maintain the rural and unique character of the County’s unincorporated communities. In order to carry out the goal of promoting compact development, the General Plan identifies a number of “villages” where it directs the majority of future growth. These villages are located in areas where there are existing communities that form the core of the village.

Consistent with its overarching goal of encouraging smart growth and discouraging sprawl development, the General Plan prohibits most “leapfrog” development that would place village densities at a distance from existing, established communities. The County may only approve such leapfrog development if the new village meets strict standards known as LEED for Neighborhood Development. See General Plan Policy LU-1.2.

Although the General Plan prohibits most leapfrog development, it does allow expansion of existing, designated villages in certain, narrow circumstances. Specifically, Land Use Policy LU-1.4 states that the County will “[p]ermit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

- Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding
- Potential Village development would be accommodated by the General Plan road network
- Public facilities and services can support the expansion without a reduction of services to other County residents
- The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area”

Here, the proposed Project includes new village regional category designated land uses. It therefore must comply either with Policy LU-1.2 or LU-1.4. From the Moore letter, I understand that the County is proceeding under the assumption that the Project would comply with Policy LU-1.4. For the reasons described below, the Project does not comply with this policy and the County may not rely on it to approve the proposed, new HGVS Project.¹

¹ Nor would the Project meet LU-1.2’s requirement for compliance with LEED ND certification or equivalent. Among other requirements, LEED ND mandates that projects be located in “smart” locations where there are opportunities for transit use and impacts to agricultural land are minimized. Specifically, projects must be located either on an infill site or a site that is adjacent to previously developed land where the connectivity of the site and adjacent land is at least 90 intersections per square mile.

A. The Project Is Not Contiguous With Harmony Grove Village.

The applicant acknowledges that, in order for this Project to qualify as a village expansion under LU-1.4, the Project must be “contiguous” with the existing Harmony Grove Village (“HGV”). The Moore letter claims that “Webster Dictionary defines the term ‘contiguous’ to mean adjacent. The term ‘adjacent’ is defined as ‘near’ or ‘close to.’” Moore Letter at 3, fn. 1. It therefore claims that the Project is contiguous with HGV because it will be *near* it, even though the Project boundaries *will not touch* the HGV boundary.

This position is untenable. The Merriam-Webster dictionary defines “contiguous” as “being in actual contact: touching along a boundary or at a point,” or “touching or connected throughout in an unbroken sequence[e.g.] contiguous row houses.”² Likewise, the Oxford Dictionary defines it as: “Sharing a common border; touching.”³ This commonsense definition of the term “contiguous” also comports with the General Plan’s use of the term in other contexts. For example, Policy LU-6.7 states: “Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors.” Obviously, a wildlife corridor must be continuous, or contiguous, in order to be useful for wildlife. Corridors with breaks in them, or two separate corridors that are merely “near” each other, would not provide a useful corridor.

Nor would it make sense for the General Plan to allow a village “expansion” by placing a new village at a distance from existing ones. The General Plan has a separate policy that allows *new* villages: LU-1.2. There would be little need for this separate policy if LU-1.4 also allowed village “expansion” by leapfrogging over intervening, protected or rural land and placing new village densities at a distance from existing villages.

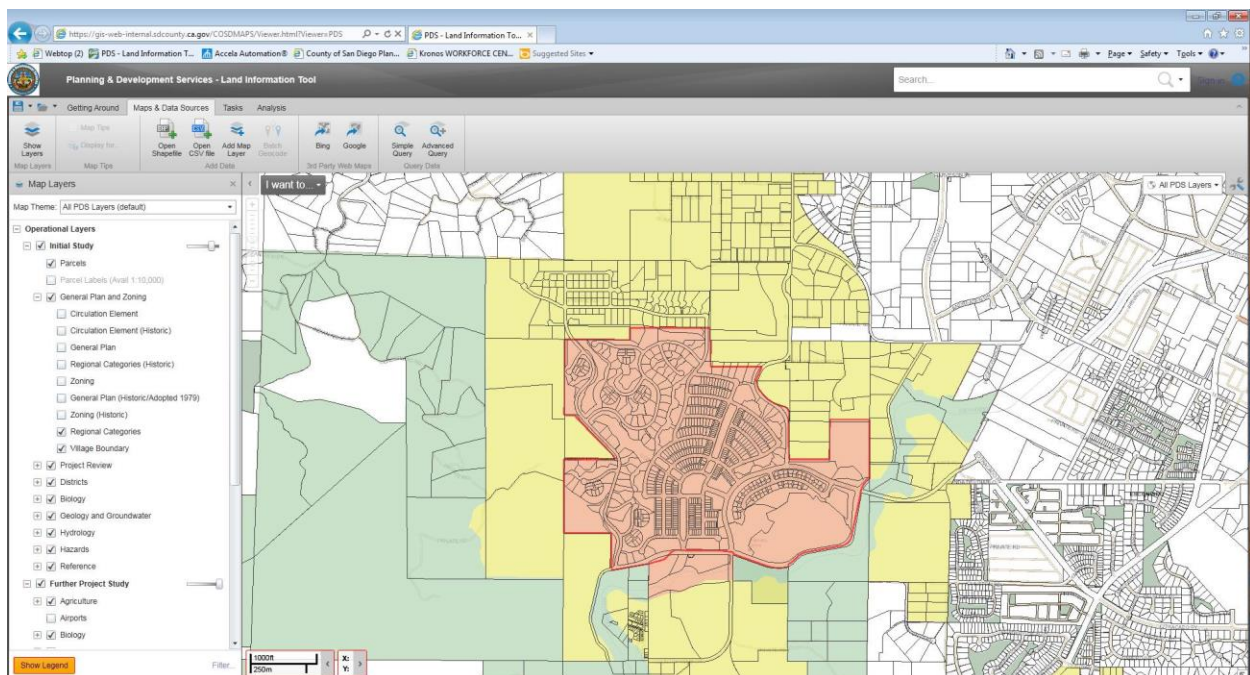
Alternatively, they may be located on a transit corridor. The Project does not meet these prerequisite requirements, not to mention myriad other requirements. See generally LEED 2009 For Neighborhood Development, available at <http://www.usgbc.org/ShowFile.aspx?DocumentID=6406>. Additionally, LU-1.2 prohibits new village densities that are located “outside established water and sewer service boundaries.” The HGVS site is located outside of an established sewer service boundary. See Exhibit 2.

² <http://www.merriam-webster.com/dictionary/contiguous>

³ http://www.oxforddictionaries.com/us/definition/american_english/contiguous

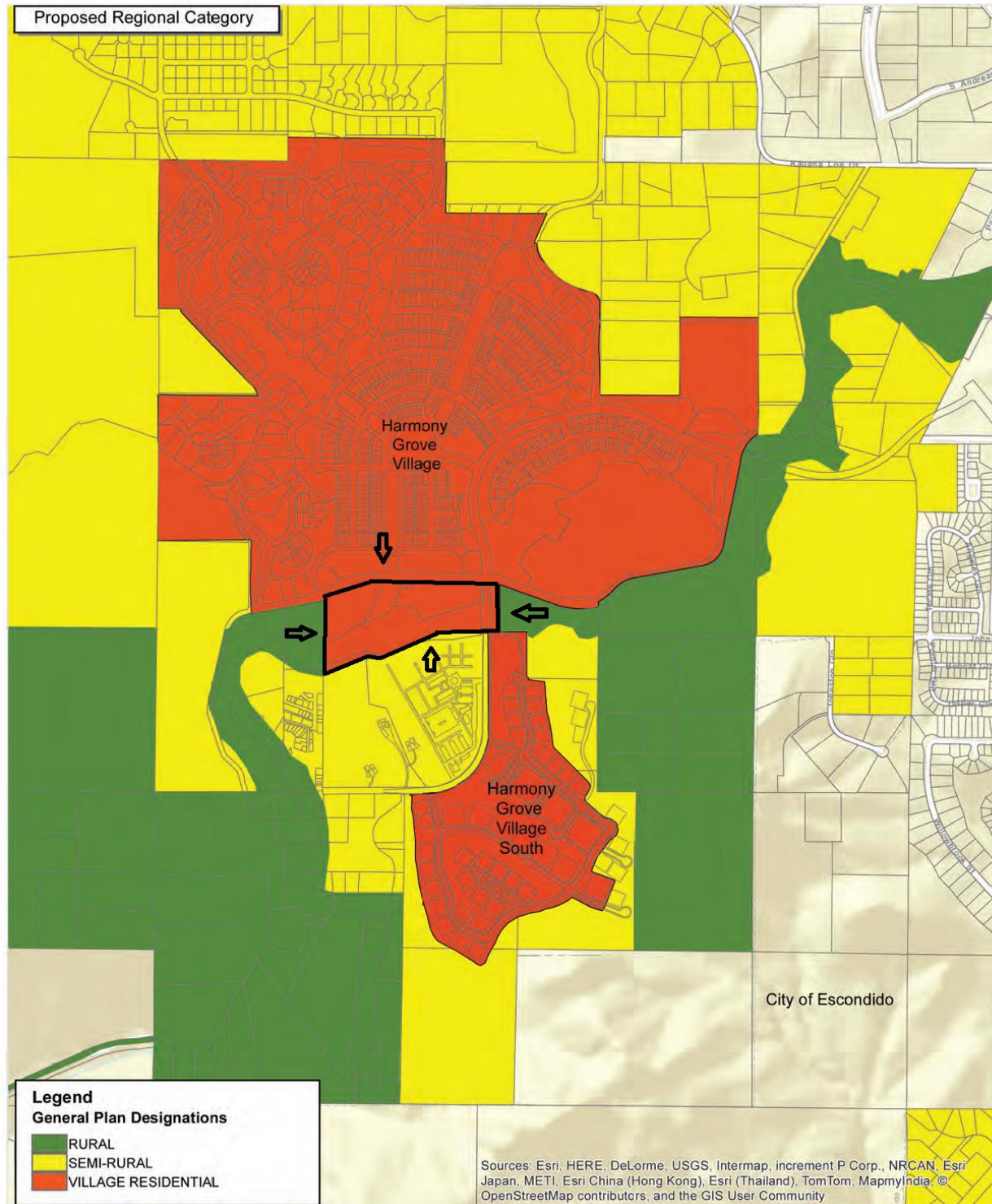
Here, the proposed Project boundary does not touch the HGV boundary and is therefore not contiguous with it. The following graphics demonstrate this fact. The first graphic shows the HGV village limit line. Although some property to the south of the village limit line is designated with village regional category land uses (see orange area to the south of the red village limit line), it is clearly outside the village limit line, and therefore outside of the existing village. The graphic also shows how this area to the south of the village limit line contains large parcels that have not been subdivided for dense, village development. This area is designated for a public park, protected creek/flood control channel, and protected riparian corridor for Escondido Creek. See Harmony Grove Specific Plan at 44. The area is slated to contain a public equestrian ranch.

Although this area is within the Harmony Grove Specific Plan, it is outside of the village limit line. Notably, the Community Plan was updated *after* the HGV Specific Plan was approved. The County therefore made a conscious decision to exclude this area from the community's designated village.



The next graphic demonstrates that the proposed HGVS is not adjacent to the HGV limit line. A miniscule portion of HGVS is across a road from the equestrian land described above that is designated with village regional categories. This area is outlined in black. Although this equestrian land is designated with village regional categories, it

will be used for a public equestrian park and a protected riparian and creek corridor. This public, protected corridor is contiguous with land to the east and west that is designated with rural regional categories (see area in green, below). Together, this greenbelt forms a complete barrier of protected, open space or rural land between HGV and the proposed HGVS. The proposed Project would leap over this protected corridor and place a completely new village at a distance from the existing village, in direct contravention of LU-1.4. Because HGVS is not contiguous with the existing village, the County may not approve the Project under the guise of expanding an existing village pursuant to LU-1.4.



The Moore letter attempts to get around the fact that HGVS's boundary does not touch the HGV limit line by emphasizing that the Project would be located approximately 300 feet from the County's public equestrian park, which is designated with a village regional category. The letter implies that the Project only needs to be contiguous with land designated with village regional categories, and need not be contiguous with the actual village limit line. This contention is incorrect. As an initial matter, even the Moore letter admits that the Project is hundreds of feet from the equestrian park and its village-designated categories. Accordingly, it is not even contiguous with these parcels.

But even if HGVS were contiguous with the equestrian park and its village-designated land, this would be irrelevant for purposes of analyzing General Plan consistency. Policy LU-1.4 requires new Village Regional Category designated land to be contiguous with an existing or planned *village*, not just contiguous with village regional category designated land. See Policy LU-1.4 (permitting village expansion "only where contiguous with an existing or planned *Village*") (emphasis added).

Here, the relevant village—HGV—is defined by a village limit line contained in the Community Plan, not by the designation of its land under the village regional category. The Community Plan states that "[t]he Harmony Grove Village Boundary, shown on Figure 3 on page 25, is a growth boundary that identifies land to which development should be directed. Areas outside this limit line are not intended to expand and should retain the original Harmony Grove rural residential and agricultural character." Community Plan at 27. As the General Plan describes, Community Plans are allowed to set village boundaries such as this which "define[] the extent of a village or rural village as a means to direct future growth and identify where development should be directed." General Plan at 10-32 (defining "Village Boundary").

Accordingly, the General Plan allows community plans to set village boundaries, and the Community Plan did that by setting the village limit line. 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. It is this clear boundary, and not the designation of land under the village regional category, that sets the village boundary with which any village expansion must be contiguous. Because HGVS is not contiguous with—i.e., it is not touching—the village limit line, the County may not approve the Project pursuant to LU-1.4.

B. The Project Is Not Consistent With the Community's Rural Character.

The County may not approve the Project for the additional reason that it is not consistent with the community character, scale, and orderly and contiguous growth of a Village area, as required by LU-1.4. As described more fully in the sections below, the Project is completely out-of-character with the surrounding rural, large-lot, equestrian-friendly community. Its hundreds of new urban-style residences are not in scale with the surrounding community and would overwhelm the community's rural residences and rural voice.

It also does not promote orderly and contiguous growth. HGV was designed so that more dense areas are at the center of the community and density decreases toward the edge so as to 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.

This approach is anathema to various General, Community and Specific Plan policies that protect rural lands by requiring village development to feather densities out in order to provide transitions and buffers with surrounding land. For example, the General Plan land use map designates the Project site as semi-rural land, and designates the vast majority of the land to the east and west of the Project site with rural categories. The General Plan describes how the semi-rural land use designation "function[s] as a transition between the Village and Rural Lands categories." General Plan, Land Use Element at 3-8. Because the Project would redesignate the site with village regional categories, it would no longer serve as a transition between village and rural designations. See also Community Plan at 1 (describing how "[t]he Plan's policies require that development be comparable to, or transition with, existing development").

In sum, the proposed Project is not a logical extension of the HGV, but is really a completely new village that would be separated from HGV. The County must abide by the Community Plan's mandate to restrict urban-style development to HGV and to not allow such development outside of the existing village limit line. The Project applicant is attempting to stretch the language of LU-1.4 far beyond the breaking point, and the

County must reject this approach. The General Plan and Community Plan are the constitutions for the community's growth, and the County must uphold them by denying this Project.

III. The Project Violates Numerous Policies in the Community Plan

A. The Project Violates the Community Plan's Mandate to Retain the Area's Rural Character.

The Harmony Grove community is defined by its rural character. As the Community Plan describes, the community contains primarily single-family rural residences located on estate lots that sprawl over the hillsides. Community Plan at 16. The community's residents value open space, quiet, dark nighttime skies and low traffic volumes. *Id.* "Some of the key elements of the Harmony Grove character and values include one- and two-story single family homes on large lots; large animal facilities on residential properties; no clustered development; [and] no 'cookie-cutter' developments." *Id.* The Community Plan describes the "ideal future state" of the community as one that has "rural idylls" and where "[t]he all-important rural voice is not overwhelmed by the urban voice." *Id.* at 23. The Community Plan contains numerous goals describing these values, and numerous policies that protect them.

The existing General Plan and Community Plan, as well as the Harmony Grove Specific Plan, are the result of years of negotiation and compromise. 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.⁴

The Community Plan, which was updated in 2011, reflects this understanding. It contains the goal to preserve "the lifestyle of the rural resident while accommodating growth," and includes a strict village limit line around HGV. Numerous Community Plan policies reflect the commitment to limit urban densities to this village area in order to preserve the rural character of the community. For example, the Community Plan describes how the "historic community is rural equestrian and agricultural, and the HG Village will have more urban densities. The rural lifestyle must not be lost to urban

⁴ See <http://www.utsandiego.com/news/2007/feb/08/supervisors-ok-harmony-grove-village/2/?#article-copy>, attached as Exhibit 3.

sprawl.” Community Plan, Issue SPA-2.2. Accordingly, it articulates the following goal: “Preservation of the unique features of a rural lifestyle, while integrating the urban lifestyle of the HG Village.” Community Plan, Goal SPA-2.2. It also adopts the following policy: “Strictly adhere to the restrictions imposed by the Village Boundary (shown in section 1.0 of this plan).” Policy SPA-2.2.5.

Similarly, the Community Plan describes how “non-resident land speculators have purchased local undeveloped land in the hopes that General Plan Amendments allowing higher density will be adopted by the Board of Supervisors,” but that “[r]esidents will continue to work to preserve this historic 100-year-old community by implementing the Village Development Pattern that was negotiated.” Community Plan at 21. It emphasizes that “[d]evelopment of these parcels outside the proposed Harmony Grove Village Boundary (refer to Figure 3) with an urban, clustered, or suburban design threatens the continued existence of the rural residential and equestrian character of Elfin Forest/Harmony Grove.” *Id.* at 31. It also describes how the village limit line around HGV “is a growth boundary” and that “[a]reas outside this limit line are not intended to expand and should retain the original Harmony Grove rural residential and agricultural character.” *Id.* at 27.

The Community Plan also contains a policy that requires all new development to utilize septic systems on site. Policy CM-10.2.1. Because septic systems require larger lots, this policy ensures that the area will continue to have homes on large, rural lots as opposed to small, clustered urban- or suburban-style homes. Further, the Plan contains policies to preserve the rural, equestrian character of the community. For example, Policy LU-1.5.3 requires the County to “[p]rovide for lot sizes that will permit residents to keep leisure and market animals on their property.” Similarly, Goal LU-1.9 describes how the Community Plan will preserve “[a]n attractive equestrian community that encourages environmentally sensitive, responsible horse keeping.” See also Policy LU-1.9.2 (“Encourage the keeping of equestrian and market animals”); Policy CM-2.3.1 (“Restrict local public roads to two-lane, undivided, curving streets; with established speed and weight limits commensurate with residential equestrian neighborhoods.”).

The proposed Project violates the Community Plan’s overarching mandate to protect the rural character of the community. Instead of proposing new, equestrian-friendly development on large lots, the proposed Project would place more than 450 homes in dense, multi-unit clusters. It would require widening a road to more than two lanes and utilizing a wastewater treatment plant instead of septic systems, and it would not allow for on-site keeping of equestrian and market animals. Additionally, it would

severely disrupt the current balance of urban and rural homes, thereby drowning out the “all-important rural voice” that the Community Plan protects.

This is the wrong project in the wrong location. The County cannot find, as it is legally required to do, that the Project “is compatible with and will not frustrate the General Plan’s goals and policies.” *Napa Citizens for Honest Gov’t*, 91 Cal.App.4th at 379. On the contrary, the Project flatly contradicts the General Plan and Community Plan and the County must reject it.

B. The Project Violates the Community Plan’s Mandate to Ensure that Urban Residences Do Not Outnumber Rural Residences.

In addition to the Project’s overall inconsistency with the General Plan and Community Plan’s goals, the Project also conflicts with specific Community Plan policies. One of these policies is to “[e]nsure that the number of urban residences does not greatly exceed that of the rural residences in the greater unincorporated communities of Harmony Grove and Eden Valley.” Policy LU-2.2.1. This policy is fundamental to the Community Plan’s overarching goal of maintaining the rural character of the community. As described above, the Community Plan repeatedly states that the community is rural in nature, is defined by its large-lot, equestrian lifestyle, and should be preserved in that manner while only allowing dense, new development in strictly defined areas.

Policy LU-2.2.1 is also mandatory; it states that the Community Plan will “*ensure*” that urban residences do not greatly outnumber rural ones. It does not state that the Plan “should strive” to maintain this balance, or that the County “should consider” this factor when approving new development. Rather, it clearly states that the County shall ensure that rural homes are not greatly outnumbered by urban ones. This policy’s strong language and firm commitment are not accidental. When the County updated its General Plan and the Community Plan in 2011, it described how it carefully choose policy language that was clear and would provide firm commitments:

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.

San Diego County General Plan Update EIR, p. O3-4, attached as Exhibit 4 (emphasis added).

Finally, the policy language is not vague or ambiguous, but is clear. The policy explicitly forbids the County from approving projects that will cause the number of urban residences to greatly exceed rural residences in the Harmony Grove and Eden Valley communities. The Community Plan describes how, in order to maintain this balance, the County must “strictly follow[]” the General Plan’s 2011 land use map. Community Plan at 21. If it follows this land use map by allowing build-out of HGV but not approving any additional dense development in the community, then “the final number of urban homes should approximately equal the number of rural homes in the neighboring communities and Harmony Grove should be able to keep its rural voice.” *Id.* In contrast, if the County does *not* strictly follow the 2011 land use map, then the number of urban homes will greatly exceed the number of rural ones.

Here, it is undisputed that the proposed HGVS is not consistent with the County’s 2011 land use map. Rather, HGVS proposes a General Plan Amendment, Specific Plan, and rezone that would allow 453 clustered, urban-style homes on land that would be designated under the Village Regional Category. As demonstrated below, approval of the Project would allow the number of urban homes to greatly exceed the number of rural homes, in violation of Policy LU-2.2.1.

The number of existing and allowed rural residences in Harmony Grove are as follows:⁵

Harmony Grove (existing residences):	125
Eden Valley (existing residences):	80
Remaining residences that could be developed under existing General Plan:	328 ⁶

⁵ Policy LU-2.2.1 requires that the number of urban residences not greatly exceed that of the rural residences in the greater unincorporated communities; however, it does not describe whether, in doing the math, the County should count only *existing* rural residences or should also count residences that would be allowed under the existing General Plan designations and zoning. In order to be conservative, we use the latter interpretation. If the former interpretation was used, HGVS would cause an even greater imbalance between urban and rural residences.

⁶ This includes 118 homes in the area that is currently proposed for the Valiano project and 210 homes in the area proposed for the HGVS Project.

Rural style residences in HGV: 55⁷
Total: 588

The number of urban residences are as follows:
Harmony Grove Village: 687⁸

Accordingly, under build out of the current General and Community Plans, urban homes will constitute approximately 54 percent, and rural homes 46 percent, of the residences in these communities. This balance ensures that the rural voice is not lost and reflects the carefully crafted compromise embodied in the Community Plan.

However, if the Project is approved, the number of urban homes will greatly exceed the number of rural ones. Under this scenario, 210 residences are subtracted from the “rural” side of the equation (representing the 210 rural homes that could have been built in the area proposed for HGVS). This leaves 378 rural homes. In addition, the Project’s 453 homes are added to the “urban” side of the equation, which would total 1140 urban homes. In sum, there would be 378 rural homes and 1140 urban homes. Rural homes would constitute 23 percent of the community’s residences, and urban homes would constitute 77 percent of residences. In other words, urban homes would outnumber rural ones by more than a three to one ratio, demolishing any chance of maintaining the community’s rural voice.

If urban homes greatly outnumber rural ones, the Community Plan’s careful balance will be lost. Among other impacts, approving HGVS and its urban-style homes would cause more traffic on the area’s small, 2-lane country roads. Existing residents ride horses and walk along these roads, and these activities would become far more dangerous with increased traffic. Additionally, new residents who are not accustomed to equestrian communities might not know to slow down when driving by horses so that they do not spook them. The increased traffic, in turn, could lead to pressure to widen the roads or change their status to Rural Collector roads.

New, urban residents are also more likely to complain about smell or noise from large animals in the vicinity. Additionally, urban areas contain street lights, which

⁷ HGV contains 55 larger lots around its periphery that allow on-site equestrian uses and might conceivably be considered “rural” for purposes of this analysis.

⁸ HGV allows 742 homes total. See HGV Specific Plan at 10. Subtracting 55 larger-lot, equestrian homes from this number equals 687.

diminish the dark skies that define the existing community. See Community Plan at 16 (describing how the community's residents value dark nighttime skies). Residents of urban/suburban communities also expect different levels of service and different amenities, and may lobby over time to have sidewalks, more street lights, wider roads, more commercial areas, and other services. If urban residents greatly outnumber rural ones, then these residents will have a much greater say in the way the area develops over time.

In short, approving the Project would violate the Community Plan's clear policies to maintain the rural voice and atmosphere. Courts have repeatedly overturned jurisdictions' approval of projects that are inconsistent with fundamental, mandatory and clear general plan policies such as the ones applicable here. *FUTURE*, 62 Cal.App.4th at 1341-42; *Endangered Habitats League, Inc.*, 131 Cal.App.4th at 783; *San Bernardino Valley Audubon Society, Inc. v. County of San Bernardino* (1984) 155 Cal.App.3d 738.

The *FUTURE* case is particularly analogous here. In that case, El Dorado County's general plan restricted low density residential designations "to those lands contiguous to Community Regions and Rural Centers to provide for a transition of density into the Rural Regions." *FUTURE*, 62 Cal.App.4th at 1340. Like San Diego County's "rural village" concept, El Dorado County's Community Regions and Rural Centers were areas identified in the general plan for development of rural towns. *Id.* A developer proposed a project that would have designated low density residential property in areas that were not contiguous with—i.e., not immediately bordering—a Community Region or Rural Center. *Id.* The County argued that any such general plan inconsistency was not fatal to the project approval because the project was consistent with numerous other general plan policies and it had discretion to balance the various policies in its plan. *Id.* at 1341.

The court of appeal emphatically rejected the county's arguments. It noted that the proposed project was separated from nearby Community Regions and Rural Centers by rural residential land use designations, and therefore was not contiguous with those regions and centers. *Id.* at 1340. It also specifically disagreed with the county's argument "that inconsistency with simply one general plan policy should not be enough to scuttle a project." *Id.* The court acknowledged that projects need not be consistent with each and every general plan policy if those policies are "amorphous in nature" or not fundamental to the plan. *Id.* at 1341-42. But it found that the general plan "policy of contiguous development" is "fundamental[,] . . . mandatory and anything but amorphous." *Id.* at 1341. Accordingly, it overturned the county's finding that the project complied with the general plan.

As described above, San Diego County's policy of contiguous development for village expansions is strikingly similar to the policy of contiguous development in *FUTURE*. Like the policy at issue in *FUTURE*, the County's policy here is central to the General Plan's vision of restricting dense development to the core of villages and requiring densities to feather out to the surrounding rural areas. The policy is also expressed in mandatory language and is not amorphous. As in *FUTURE*, the proposed Project's inconsistency with this General Plan policy prevents the County from approving the Project.

C. The Project Is Inconsistent With the Community Plan's Requirement That New Development Utilize Septic Systems.

The Community Plan also protects the rural character of the community by forbidding new, dense development that would require homes to connect to a wastewater treatment plant. Policy CM-10.2.1 states: "Require all proposed new development to use septic systems with one septic system per dwelling unit." By requiring new development to have septic systems, and disallowing new treatment plants, the Community Plan ensures that new homes will be built on lots that are large enough to allow septic. See County Code § 68.341(e) (requiring that subdivisions with septic systems must allow adequate land for the system, plus reserve area). The existing HGV does contain a small treatment plant, but the HGV Specific Plan—which allowed this treatment plant—was approved before the Community Plan was updated in 2011. Accordingly, the Community Plan was drafted to allow this treatment plant to continue serving the HGV community, but to forbid new homes from hooking up to it or building their own treatment plant.

The proposed HGVS would develop more than 450 homes at densities that would not allow individual septic systems. The Project is thus flatly inconsistent with this policy. The policy also meets the *FUTURE* criteria for being fundamental, mandatory and clear. It is fundamental to maintaining the rural character of the community because it explicitly restricts small-lot, urban or suburban development, which is one of the Community Plan's core goals. It is drafted in mandatory language: "*require all* proposed new development to use septic systems . . ." It is also clear and unambiguous. There is no wiggle room for developers to claim that their project complies; either new homes will have on-site septic or they will not.

Oddly, the Moore letter claims that this policy is somehow not applicable to the Project for two reasons. First, it claims that the Policy is inapplicable because the current General Plan designation for the site is Semi-Rural Residential (SR-.5), which allows ½

acre lots. It claims that half acre lots are not large enough to allow on-site septic. This argument is irrelevant. The current designation for SR-.5 does not *require* half acre lots or guarantee that landowners will be allowed to subdivide the property into half acre lots. Rather, it merely allows this as a possible maximum density if development on those lots is *also* consistent with other General Plan and Community Plan policies, including the requirement for on-site septic. Thus, even if current zoning or General Plan designations might otherwise allow for smaller lots, the County may not allow subdivision unless the subdivided lots will be large enough to utilize on-site septic systems. See *FUTURE*, 62 Cal.App.4th at 1342 (“a subdivision must not only be consistent with the general plan map, but also consistent ‘with the plan’s written policies and standards regarding uses, density, and intensity.’”).⁹

The Moore letter also makes the irrelevant observation that the Project would be designated with Village Regional designations and that villages are typically served by sewer systems. It may be true that villages are typically served by sewer systems, but this does not somehow make the policy inapplicable to the Project. On the contrary, it demonstrates that this Project—or any new or expanded village in the Community Plan area—is inconsistent with the Community Plan. The Community Plan does not contain an exception to its septic requirement for new village areas.

IV. The Project Fails to Comply With Various Standards For Protection of Health and Safety Due to Wildfire.

A. The Project Violates the County’s Fire Protection Standards for Secondary Egress, and There Is No Evidence to Support An Exception to These Standards.

The Project site is located within a statutorily designated State Responsibility Area Very High Fire Hazard Severity Zone. Numerous fires have burned through this area over the past decades. As outlined in a draft Fire Protection Plan for the Project, there have been 18 wildfires within three miles of the Project site since 1980. See Fire

⁹ Although the land is designated for SR-.5, it is zoned A70. As the County’s zoning ordinance describes, “[t]he A70 Use Regulations are intended to create and preserve areas intended primarily for agricultural crop production.” San Diego County Zoning Ordinance, Agricultural Use Regulations, § 2700. Having the properties zoned for agricultural crop production in no way supports an inference that septic systems were not intended for the parcels. On the contrary, it highlights the fact that the parcels were never intended for high-density residential development.

Protection Plan, Harmony Grove Village South, March 2015 at 15. These have burned more than 180,000 acres. *Id.* As recently as 2014, the Cocos Fire caused a mandatory evacuation order for the Harmony Grove Community and burned 26 homes and many outbuildings at the dead end of Country Club Drive within 1/4 mile of the Project.¹⁰

The County's Fire Code requires that developments meet numerous, strict standards in order to protect health and safety, ensure that emergency vehicles can access sites, and ensure that residents can evacuate safely. Relevant here, section 503.1.3 of the Fire Code states: "Dead-end roads. The maximum length of a dead-end road, including all dead-end roads accessed from that dead-end road, shall not exceed the following cumulative lengths, regardless of the number of parcels served: . . . Parcels zoned for less than 1 acre: 800 feet." This regulation ensures that residents have multiple egress routes so that if one road is blocked in the event of a fire, residents can still escape. It also ensures that there are multiple routes for emergency personnel to access a site, thereby providing firefighting and emergency response capabilities.

The requirement for secondary egress is absolutely crucial. CalFire publishes a "personal wildfire action plan" that describes how families should "[h]ave several travel routes in case one route is blocked by the fire or by emergency vehicles and equipment." CalFire, Ready, Set, Go!: Your Personal Wildfire Action Plan, at 10, attached as Exhibit 5. This allows residents to "[c]hoose an escape route away from the fire." *Id.* See also *id.* at 8 (families should "Plan several different evacuation routes"). Similarly, the Rancho Santa Fe Fire District cautions that residents should "[i]dentify a minimum of two (2) main exit routes from your neighborhood. Map out alternative routes in the event main routes are blocked." See *Getting Out Alive: Preparing for Wildfire and Evacuation in the Wildland Urban Interface* at 6, attached as Exhibit 6. The Fire District emphasizes the importance of having a secondary evacuation route because, "[w]hen evacuating, [residents should] use a route that takes you in the opposite direction of the fire."¹¹ The Fire District also cautions that some roads may be closed during emergencies in order to facilitate emergency equipment.¹²

¹⁰ See <http://www.nbcsandiego.com/news/local/Firefighters-Respond-to-New-Fire-in-San-Marcos-259298161.html>

¹¹ <http://www.rsf-fire.org/prepare/wildfire/index.html>

¹² <http://www.rsf-fire.org/prepare/wildfire/index.html>

Here, the Project proposes to subdivide the property into parcels that are less than an acre in size, thereby triggering the requirement to have no dead-end roads longer than 800 feet. However, the Project proposes to have a dead-end road that is **1.3 miles long**. See Harmony Grove Village South Fire Protection Plan at 20, attached as Exhibit 7. Accordingly, some Project residents would have to drive 1.3 miles before they have a choice of directions to escape. Emergency vehicles would also have to access the Project on the same road that residents are using to attempt to escape.

Despite the overwhelming need for and logic of providing a secondary egress route, the Project applicant is currently asking the County to waive this requirement. Although the County has some discretion to approve exceptions to the County Fire Code, there is no possible justification for approving this requested exception. In order to approve it, the relevant fire code official must find that the exception “is in compliance with the intent and purpose of this code and that such modification does not lessen health, life and fire safety requirements.” County Fire Code § 96.1.104.8. The applicant must also provide material facts to support its request for the exception, as well as mitigation measures to address safety impacts caused by the exception. *Id.*

In its proposed Fire Protection Plan, the Project applicant admits that the Project will not meet the Fire Code’s standards for secondary egress and attempts to demonstrate that the Project nevertheless meets the intent and purpose of the code and will not threaten public safety. These justifications and rationales are unconvincing and do not provide substantial evidence to support the requested exemption.

First, the Project applicant states that a secondary egress route will be available, though admits that the route does not meet Fire Code standards for grade, pavement surface and other attributes. FPP at 33. In addition to these inadequacies, the route is located far more than 800 feet from residences in the south-western Project area. See FPP, Appdx. E. Due to the location and substandard condition of the road, this potential escape route does not assure protection of health, life and fire safety requirements or meet the intent of the Fire Code’s requirement for secondary egress.

The Project applicant also states that Country Club Drive will be widened to include three travel lanes, therefore allowing for greater access and less risk of congestion in the event of evacuation. FPP at 33. This justification ignores that secondary egress routes are important because they allow residents to escape in a different direction than a fire. Having more travel lanes will do no good if a fire is burning to the west of the Project and proceeds to burn along the Escondido Creek corridor, covering the Project’s only evacuation route in dense smoke or fire. This creek corridor is filled with natural

vegetation and is a large source of fuel. The FPP also does not describe whether the bridge will be constructed of nonflammable material that can withstand a blaze. If it is not, a fire could completely destroy the only meaningful escape route for Project residents.

The applicant claims that an exception is warranted because the Project will allegedly exceed standards for ignition-resistant buildings, fuel-modification zones, vegetation-free buffers around homes, and fire hydrant flow requirements. *Id.* at 34-36. But none of these measures make up for the lack of adequate egress. Although they may help ensure that Project homes do not burn, they do nothing to ensure that residents can evacuate in a timely manner in order to avoid smoke from approaching wildfires. Experts recognize that “[s]moke from California wildfires injures and kills more individuals than the actual fires.”¹³

Ironically, the Fire Protection Plan states that one of its mitigation measures is the development of an emergency preparedness guide based on CalFire’s “Ready, Set, Go!” model. FPP at 38. As described above, CalFire’s model plan states that residents should always have multiple evacuation routes. Thus, the applicant’s proposed mitigation measure cannot reasonably be said to resemble CalFire’s model, as it ignores one of the main safety features recommended by CalFire: multiple evacuation routes.

In sum, the Project applicant is not requesting a minor exception to the Fire Code. Rather, it is asking that the County accept significantly reduced fire safety standards on a very large development project. The proposed dead-end road that would serve the Project is *more than 8.5 times as long* as the maximum allowed distance for dead-end egress routes. And the Project would include more than 450 homes in an area that is subject to severe wildfire and that was evacuated as recently as a year ago. This is completely unacceptable and the County may not approve such a dangerous exception to its Fire Code.

B. The General Plan Prevents the County From Approving a Fire Code Exception.

The County must abide not only by the Fire Code’s rules for egress, but must also comply with the General Plan. Thus, even if the Fire Code allowed the County to approve an exception to the secondary egress standard in this instance, the County must still analyze consistency with the General Plan. Here, the General Plan states that:

¹³ <http://waterdamagesd.com/wildfire-smoke-dangerous/>

New development should be located and designed to protect life and property from [fire] and similar hazards. In high risk areas, development should be prohibited or restricted in type and/or density. In other areas, structures, properties, infrastructure, and other improvements should be designed to mitigate potential risks from these hazards. Development that cannot avoid high risk areas should be carefully reviewed for consistency with County building codes and development regulations to eliminate or minimize potential risks.

It also has other policies that address wildfire risk and the need for effective evacuation. For instance, Policy S-2.6 states: “Effective Emergency Evacuation Programs. Develop, implement, and maintain an effective evacuation program for areas of risk in the event of a natural disaster.”

The Project fails to comply with these General Plan policies. Rather than prohibiting or restricting development in this high fire danger area, the County is proposing to allow more than 450 new homes. Instead of carefully reviewing the Project for consistency with the Fire Code, the Project applicant is requesting a dangerous and possibly unprecedented exception from one of the Code’s main safety provisions. The County cannot develop and implement an effective evacuation program for more than 1,000 new residents that live down a dead-end road in a development with only one effective evacuation route. The Project clearly conflicts with the General Plan and the County must reject it.

C. Allowing An Exception for the County’s Secondary Egress Standards Would Violate the County’s Hazard Mitigation Plan and Jeopardize Federal and State Disaster Funding.

The County took part in preparing the Multi-Jurisdictional Hazard Mitigation Plan (“Hazard Plan”),¹⁴ which is a disaster preparedness document adopted to comply with the Disaster Mitigation Act of 2000. Under this federal legislation, increased funding is available to states and jurisdictions that have developed comprehensive mitigation plans, and states and communities must have an approved mitigation plan in place prior to receiving post-disaster funds. In order to ensure that the County can take full advantage of state and federal disaster-related grant programs, it must comply with the adopted hazard mitigation plan.

¹⁴ Available at <http://www.sandiegocounty.gov/content/dam/sdc/oes/docs/2010-HazMit-Final-August-2010.pdf> and excerpts attached as Exhibit 8.

The Hazard Plan describes how the County's topography "creates an ever-present threat of wildland fire" and the County should use large fires, such as the Firestorm of October 2003, "as a guide for fire planning and mitigation." *Id.* at 4-43. It also lists specific goals for reducing wildfire risk and actions the County will take to carry out those goals. Relevant here, the Hazard Plan promulgates the goal of "[p]romot[ing] disaster-resistant future development." *Id.* at 5-294. To carry out this goal, the County committed to "[f]acilitate consistent enforcement of general plans, zoning ordinances, and building codes," and to "[l]imit future development in hazardous areas." *Id.* The County also committed to ensure that "[h]igh fire hazard areas shall have adequate access for emergency vehicles." *Id.*

The Project violates these standards. First, the proposed Project would require an exception to the County's requirement for secondary egress. To the best of my knowledge, the County has never before granted such a large exception for a project of this size. As described above, any such exception is unjustified and would not protect residents' health and safety. Accordingly, granting this exception would mean that the County is not consistently enforcing its general plan and building code requirements for fire safety and secondary egress, as required by the Hazard Plan.

Second, if the Project includes only one County-compliant egress route, this would violate the County's commitment to ensure that high fire hazard areas have adequate emergency vehicle access. With only one route in and out of the Project site, emergency vehicles may have inadequate access because residents will be using the same street to evacuate. Further, emergency vehicles need to be able to evacuate if they are fighting a fire that becomes too threatening. With only one egress route, the Project could trap firefighters in a deadly blaze. Last, the Project does not limit development in hazardous areas, as required by the Hazard Plan. Rather, it would place hundreds of homes and more than a thousand new residents at risk.

The County must analyze the inconsistency of the Project with this Hazard Plan as part of its environmental review pursuant to the California Environmental Quality Act. 14 Cal. Code Regs. § 15125(d) (environmental impact reports must analyze inconsistencies between a proposed project and applicable regional plans for protection of resources); 14 Cal. Code Regs., §§ 15000 et seq, Appendix G, § VIII(g) (projects may have significant environmental impacts if they will "[i]mpair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan"). As part of this analysis, it must analyze whether these inconsistencies may lead to reduced federal and state disaster funding, and consequent environmental impacts. For example, if Project approval causes the County to violate the Hazard Plan, and therefore

risk losing disaster funding, it is reasonably foreseeable that reduced funding may cause environmental impacts related to the County's inability to prepare for and clean up after future disasters.

The Project's inconsistency with the Hazard Plan could jeopardize the County's ability to receive state or federal disaster funding in the event of a natural disaster. The County expended time and resources helping develop the Hazard Plan and cannot and should not lightly throw aside the commitments it made in that Plan. As the Plan states, the County is committed to consistently enforcing its Fire Code. Consistent enforcement requires the County to reject any version of this Project that includes only one compliant evacuation route.

D. Even if the County Could Proceed With This Project, It Should Rely on the Rancho Santa Fe Fire District, Not CalFire, to Provide Firefighting Services.

The Project site lies within the Rancho Santa Fe Fire District's sphere of influence, and the District has submitted a LAFCO application to annex this land. Nevertheless, I understand that the County is considering having the County Fire Authority take jurisdiction for fire services for this Project, and then contracting with CalFire to provide the services. This is both a risky proposition as well as unnecessary.

It is not clear that CalFire may lawfully contract with the County to provide firefighting services that facilitate rural, non-infill development such as this Project. As a state agency, CalFire is legally obligated to ensure that its funding and infrastructure decisions conform to the state's planning priorities and Environmental Goals and Policy Report ("EGPR"), codified in Section 65041.1 of the Government Code. As described in the attached letter sent to CalFire, these priorities include promoting infill development, protecting agricultural and open space land, and reducing driving and associated greenhouse gas emissions.

Here, the HGVS Project is located in a rural area, will convert large swaths of farmland, and will likely cause greater driving and climate pollutants because it is relatively far from sizable commercial and job centers. Accordingly, I have asked CalFire to provide information regarding whether its provision of infrastructure, funding and services to rural developments such as HGVS will conform with state law. If the County wishes to contract with CalFire for services for this Project, I believe it would be inappropriate for the County to proceed with processing this development application until the issue of CalFire's ability to lawfully provide these services is resolved.

There is also no reason for the County to contract with CalFire for fire services in this location. As described above, the Rancho Santa Fe Fire District has submitted an application to LAFCO to annex the Elfin Forest/Harmony Grove area, which lies within its sphere of influence. The Rancho Santa Fe Fire District will be able to provide adequate service to the rural residences in the area, and this annexation makes logical sense, as the District already serves much of the surrounding area.

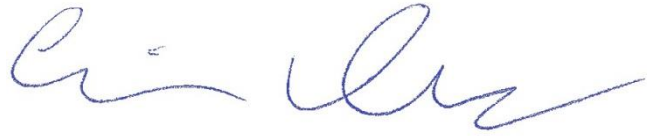
The Rancho Santa Fe Fire District will also be able to provide an impartial assessment of whether the Project may legitimately obtain an exception to the County's secondary egress standard. In contrast, if the County Fire Authority took jurisdiction of the area as part of a contract for services with CalFire, the Town Council is concerned that the County might be unduly inclined to approve such an exception to the egress standard. This is because the Project is slated to be served by the planned Harmony Grove Village fire station, yet this station is currently underfunded. Approving HGVS would provide more homes and more funding for this fire station, thereby helping address this funding shortfall. Although the funding shortfall is serious and the County should consider all reasonable ways to rectify it, the County cannot and should not allow such budget decisions to sway its determination of whether to approve this Project or give itself the authority to approve an exception to its fire standards. The lack of appropriate secondary egress is an incredibly important public safety issue that cannot be swept aside for the sake of correcting the County's failure to secure adequate funding for the HGV fire station.

Conclusion

The proposed Project violates numerous, core policies of the Community Plan and General Plan and the County must reject it.

County of San Diego
June 25 2015
Page 26

Regards,



Erin B. Chalmers
SHUTE, MIHALY & WEINBERGER LLP

cc (e-mail only):

Bill Horn, Supervisor, District 5
Dave Roberts, Supervisor, District 3
Dianne Jacob, Supervisor, District 2
Ron Roberts, Supervisor, District 4
Greg Cox, Supervisor, District 1
David Sibbett, Planning Manager, PDS
Cara Lacey, Interim Chief of Project Planning
Bruce Liska, San Dieguito Planning Group
David Kovach, RCS Harmony Partners, LLC
Marcel Arsenault, Real Capital Solutions
Brian Paul, Homebuilder Capital Solutions

(Only Exhibit 1 is being attached for those on the cc list)

Exhibits:

- 1) June 25, 2015, Letter to CalFire re Environmental Goals and Planning Report
- 2) Harmony Grove Village Sewer District Boundary
- 3) Q. Eastman, *Supervisors Approve Harmony Grove Village*, Feb. 8, 2007
- 4) San Diego County General Plan Update EIR (excerpts)
- 5) CalFire, Ready, Set, Go!: Your Personal Wildfire Action Plan

- 6) Getting Out Alive: Preparing for Wildfire and Evacuation in the Wildland Urban Interface
- 7) Harmony Grove Village South Fire Protection Plan
- 8) Multi-Jurisdictional Hazard Mitigation Plan

682955.4

EXHIBIT 1

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Attorney
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June 25, 2015

Via E-Mail and U.S. Mail

Tony Mecham
Unit Chief, San Diego Unit
California Department of Forestry and Fire
Protection
2249 Jamacha Rd.
El Cajon, CA 92019

Re: Consistency Between State Environmental Goals and Policy Report
and Fire Service to Harmony Grove Village South

Dear Mr. Mecham:

This firm represents the Elfin Forest Harmony Grove Town Council (“Council”) in matters related to San Diego County’s consideration of the proposed Harmony Grove Village South Project (“HGVS Project”). It also represents the Cleveland National Forest Foundation in matters related to the County’s consideration of the proposed Lilac Hills Ranch Project (“Lilac Hills Project”). This firm recently learned that the California Department of Forestry and Fire Protection (“CalFire”) might enter into a contract with the County to provide fire protection services and associated infrastructure to the HGVS Project. Likewise, the County is currently planning to rely on CalFire’s Miller station to provide primary firefighting and first responder infrastructure and service for the 1700 plus home Lilac Hills Project.¹

I question whether it is inappropriate for CalFire to provide infrastructure, funding or support that facilitates the approval and construction of the HGVS and Lilac Hills Projects or similar large, sprawl developments located in the fire-prone wildland urban interface. As a state agency, CalFire is legally obligated to ensure that its funding and infrastructure decisions conform to the state’s planning priorities and Environmental

¹ See Lilac Hills Ranch Fire Protection Plan, pp. 27-31, at http://www.sandiegocounty.gov/content/dam/sdc/pds/regulatory/docs/LILAC_HILLS_RANCH/Recirculation/GPA12001-REIR-AppendixJ-Fire_Protection_Plan-061214.pdf.

Goals and Policy Report (“EGPR”), codified in Section 65041.1 of the Government Code. As described more fully below, these priorities include promoting infill development, protecting agricultural and open space land, and reducing driving and associated greenhouse gas emissions. Here, the HGVS and Lilac Hills Projects are located in rural areas, will convert large swaths of farmland, and will cause greater driving and climate pollutants. They are also located in high fire danger zones.

Pursuant to Government Code section 65042(c), which directs every state agency and officer to “[c]omply with any request for advice, assistance, information, or other material” related to that agency’s compliance with the EGPR, I request that CalFire provide information regarding whether its planning documents conform to the state’s planning priorities and the EGPR. I also request that CalFire determine whether it may lawfully provide funding, infrastructure or other support for the HGVS or Lilac Hills Projects. If CalFire believes that it may provide such support, please provide information demonstrating how this support complies with the state’s planning priorities and EGPR.

CalFire provides vital services to many rural areas, and the public is indebted to CalFire for the hard and often dangerous work its employees perform in order to protect the state’s residents and resources. At the same time, the state has limited resources and has enacted laws to ensure that CalFire and other state agencies carefully utilize these resources to further particular health, safety and environmental goals and to protect taxpayer resources. I appreciate CalFire’s careful consideration of this matter.

California Law Sets Environmental Planning Priorities for State Agencies

Under California law, state agencies and officials that request infrastructure funding must “specify how that infrastructure is consistent with the state planning priorities specified pursuant to [Government Code] Section 65041.1.” Gov. Code § 13103. Those priorities include promoting infill development and ensuring that any infrastructure associated with non-infill development supports efficient land use, is built adjacent to existing developed areas, is in an area appropriately planned for growth, is served by adequate transportation and other essential utilities and services, and minimizes ongoing costs to taxpayers. Gov. Code § 65041.1(a), (c). They also include “protecting, preserving, and enhancing the state’s most valuable natural resources, including working landscapes such as farm, range, and forest lands, natural lands such as wetlands, watersheds, wildlife habitats, and other wildlands” Gov. Code § 65041.1(b). Agencies must ensure that their functional plans are consistent with these priorities and “annually demonstrate” such consistency when requesting funding. Gov. Code § 65042(b).

Agencies must also look to the EGPR “as a basis for judgments about the design, location and priority of major public programs, capital projects and other actions, including the allocation of state resources for environmental purposes through the budget and appropriation process.” Gov. Code § 65047(e). The current version of the EGPR commits California to “more compact urban areas . . .” EGPR (1978) at 9.² To that end, agencies should focus on “curbing wasteful urban sprawl and directing new development to existing cities and suburbs.” *Id.* The EGPR also prioritizes “protecting the most productive agricultural lands.” *Id.* at 9, 18.

California, through the Office of Planning and Research, is in the process of updating the EGPR. The current draft directs local governments to “avoid placing infrastructure, housing, and other amenities in harm’s way without careful consideration of alternatives and co-benefits associated with the choices.” Draft EGPR at 26.³ At the same time, the draft notes that an “increase in the frequency and severity of extreme events, including. . . wildfires . . . poses potential risks to new and existing infrastructure.” *Id.* at 32.

The draft also prioritizes the protection of agricultural land and encourages compact, transit-oriented and walkable development as a way to minimize greenhouse gas emissions. According to the current draft, “[c]ompact, infill and redevelopment [are] the first priority for new development, coupled with a goal to preserve natural and working lands.” *Id.* at 3. California should preserve “[i]ntact natural systems and prime agricultural land [to] provide resilience for the natural and built environment.” *Id.* Moreover, California can reduce the amount of land needed to accommodate growth by implementing aggressive smart-growth policies including “higher density, mixed-use development, better access to transit, and other policies that facilitate reductions in driving. This reduction in land consumption can reduce pressures on agricultural and working lands, forests, and other important land resources.” *Id.* at 11. To that end, the current draft also prioritizes investments in public transit and walkable communities that are close to jobs and “provide viable alternatives to driving.” *Id.* at 15.

CalFire’s planning documents acknowledge the high costs associated with increased residential development in the wildland urban interface, but fail to demonstrate

² See 1978 EGPR: An Urban Strategy for California, at http://www.opr.ca.gov/docs/urban_strategy.pdf.

³ See Discussion Draft, California’s Climate Future, at http://opr.ca.gov/docs/EGPR_ReviewDraft.pdf.

consistency with the EGPR. They do not discuss how CalFire's provision of services to large new, rural development projects facilitates more sprawling, leap-frog development in high-risk fire zones, nor do they explain how this is consistent with state planning priorities. For example, CalFire's 2010 Strategic Fire Plan notes that climate change will result in "longer fire seasons and a greater probability of intense fires in western forests." CalFire Strategic Fire Plan at 5 (2010).⁴ At the same time, "the exposure of people and homes to these threats has increased due to population growth and development in wildland and wildland urban interface (WUI) areas." *Id.* Together these trends "complicate fire suppression and, in turn, increase the need for *fire prevention and planning efforts*." *Id.* at 6 (emphasis added). CalFire plans to "[a]rticulate and promote the concept of land use planning as it relates to fire risk" as one way to deal with these threats. *Id.* at 11. At no point, however, does the Strategic Fire Plan mention the EGPR or the planning priorities listed in Section 65041.1 of the Government Code.

CalFire's San Diego Unit Strategic Fire Plan contains the same acknowledgement of the risks, but again omits any mention of the State's planning priorities regarding infill and efficient development. *See* CalFire San Diego Unit Plan at 3 (2014)⁵ (explaining that wildland fire planning "is about the whole system of wildland fire planning and thinking about where and how people live and coexist within wildfire prone environments"); *id.* at 7 (noting that climate change, population growth in the wildland urban interface, and reduced budgets "will continue to pose challenges to the Unit regarding fire suppression, prevention, and planning"). In a particularly prescient paragraph, the San Diego Unit's Strategic Plan notes that there is a "resurgence of urban interface development in the community of Harmony Grove within SRA lands." *Id.* at 29. These are the very same sorts of development that CalFire consistently ranks as the riskiest and costliest forms of development.

These planning documents rightfully discuss the risks of placing new development in the wildland urban interface. However, they do not discuss whether CalFire needs to limit provision of infrastructure, funding and services to certain types of development projects in order to comply with the state's planning priorities and EGPR.

⁴ See CalFire Strategic Fire Plan (2010), at <http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf668.pdf>.

⁵ See CalFire San Diego Unit Plan (2014), at http://cdfdata.fire.ca.gov/fire_er/fpp_planning_plans_details?plan_id=208.

San Diego County Is Relying On CalFire Infrastructure and Services to Approve New Sprawl Development

The Lilac Hills Project is a very large residential and commercial development that would be located in the Valley Center and Bonsall planning areas. The project would develop hundreds of acres of productive farmland and would indirectly, negatively impact numerous other, nearby agricultural operations. It would be located far from Escondido and any other existing, large communities, and the property is not designated for dense development under the existing County General Plan. Additionally, it is inconsistent with SANDAG's Sustainable Communities Strategy. According to the Project's EIR, the Project's residents, employees and visitors would drive *60 million miles* per year, causing emission of more than 20,000 metric tons of climate pollutants ever year. The Project area is not served by transit. Portions of the Project are also located in very high fire danger zones.

Pursuant to its General Plan, the County requires new development of this type to demonstrate that all residences can be reached by fire and emergency services within 5 minutes. The Deer Springs Fire Protection District is the fire authority with jurisdiction over this Project.⁶ However, as that Fire District has explained to the County, it cannot provide the required response times for the Project.⁷ Accordingly, the Project's Fire Protection Plan relies on CalFire Station 15 (Miller Station), which is closer to the Project, to provide the required 5 minute response time.⁸

⁶ See Lilac Hills Ranch Fire Protection Plan, at http://www.sandiegocounty.gov/content/dam/sdc/pds/regulatory/docs/LILAC_HILLS_RANCH/Recirculation/GPA12001-REIR-AppendixJ-Fire_Protection_Plan-061214.pdf, p. 24.

⁷ http://www.sandiegocounty.gov/content/dam/sdc/pds/regulatory/docs/LILAC_HILLS_RANCH/Recirculation/publiccomment/Deer%20Springs%20Fire%20Protection%20District.pdf

⁸ Lilac Hills Ranch Fire Protection Plan, pp. 27-30 (listing Deer Springs Fire Station 11 as the primary fire station for the Project but admitting that this station can only provide 7-9 minute response times, and that the location of CalFire's Miller Station near the Project will be "critical" for providing "emergency service (medical emergencies, vehicle accidents, and structure and wildland fires)" for the Project).

The HGVS Project is located east of Escondido and South of San Marcos in the Elfin Forest/Harmony Grove planning area. The Project would construct more than 450 homes on small lots in this rural valley. Although the County has not yet conducted environmental review, the Project will likely have significant greenhouse gas emissions due to the Project's location far from existing cities, jobs and services. It will also develop dozens of acres of farmland. Notably, this type of urbanized development is specifically disallowed by the County's General Plan, which contains multiple policies to protect the rural nature of the area.

The Project site is located within a statutorily designated State Responsibility Area Very High Fire Hazard Severity Zone. According to draft Project documents, the Project would have only one entrance and egress route. It would therefore conflict with County General Plan fire safety standards, which generally require multiple egress routes. As currently proposed, the County will have to obtain an exception to this standard from the fire authority with jurisdiction over the Project. This authority is currently the Rancho Santa Fe Fire District; however, I understand that the County Fire Authority is considering taking over jurisdiction itself, and would then want to contract with CalFire to provide fire protection services.

CalFire Must Demonstrate How Its Planning Documents and Infrastructure Decisions Conform With State Law

As described above, San Diego County wishes to rely on CalFire to provide critical firefighting infrastructure and services to at least two, large new development projects located in fire-prone areas. If CalFire wishes to facilitate these or other similar developments in the County by providing firefighting services, it will need to demonstrate that its Strategic Fire Plans allow the agency to provide these services, and that the Fire Plans, in turn, are consistent with the state's planning priorities and EGPR.

Pursuant to Government Code section 65042(c), I therefore request that CalFire provide information demonstrating whether or not it believes that providing infrastructure and services to large-scale, rural developments such as HGVS and Lilac Hills would be consistent with the EGPR and Government Code section 65041.1 priorities of supporting in-fill and reducing greenhouse gas emissions, curbing wasteful sprawl, protecting farmland, and avoiding putting people and homes in harm's way.

Thank you for your attention to this matter, and I look forward to your response.

Harmony Grove Village South Project
June 25, 2015
Page 7

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Erin B. Chalmers

cc: George Gentry, Executive Officer, Board of Forestry and Fire Protection
Stephanie Shimazu, Chief Counsel, Cal Fire
Ken Alex, Director, Governor's Office of Planning and Research
Jacqueline Arsivaud, Elfin Forest Harmony Grove Town Council
Duncan McFetridge, Cleveland National Forest Foundation

688796.2

EXHIBIT 2

EXHIBIT 'B'

INDEX SHEET

LEGEND

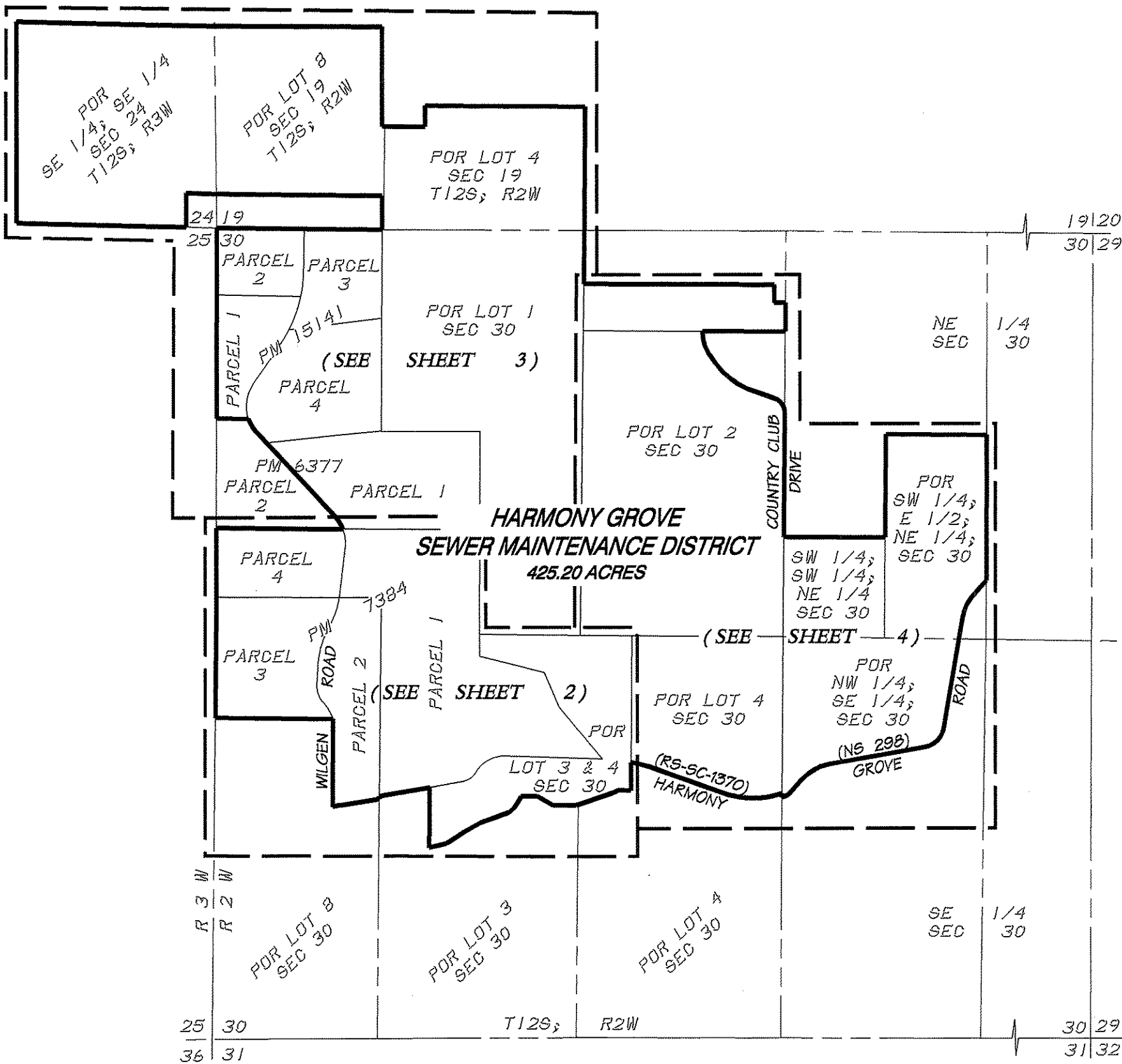
- INDICATES SEWER MAINTENANCE BOUNDARY
- INDICATES SHEET INDEX
- (R) INDICATES RADIAL BEARING

REFERENCE DRAWINGS

PARCEL MAP NOS. 6377, 7384 AND 15141



GRAPHIC SCALE 1"= 800'



SHEET 1 OF 4

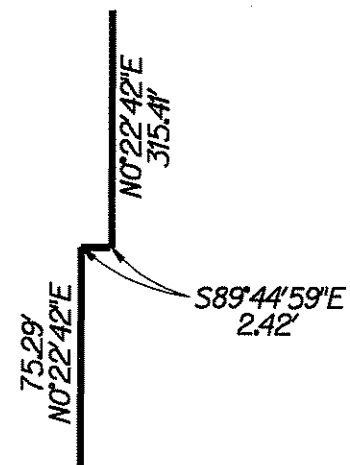
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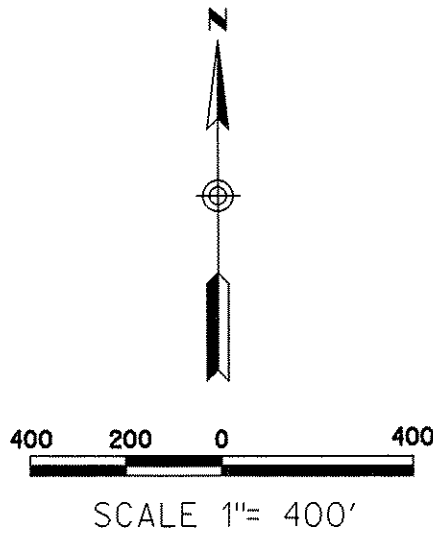
Patrick A. McMichael 9-21-2010
PATRICK A. McMICHAEL, LS 6187 DATE

**HARMONY GROVE
SEWER MAINTENANCE DISTRICT BOUNDARY**

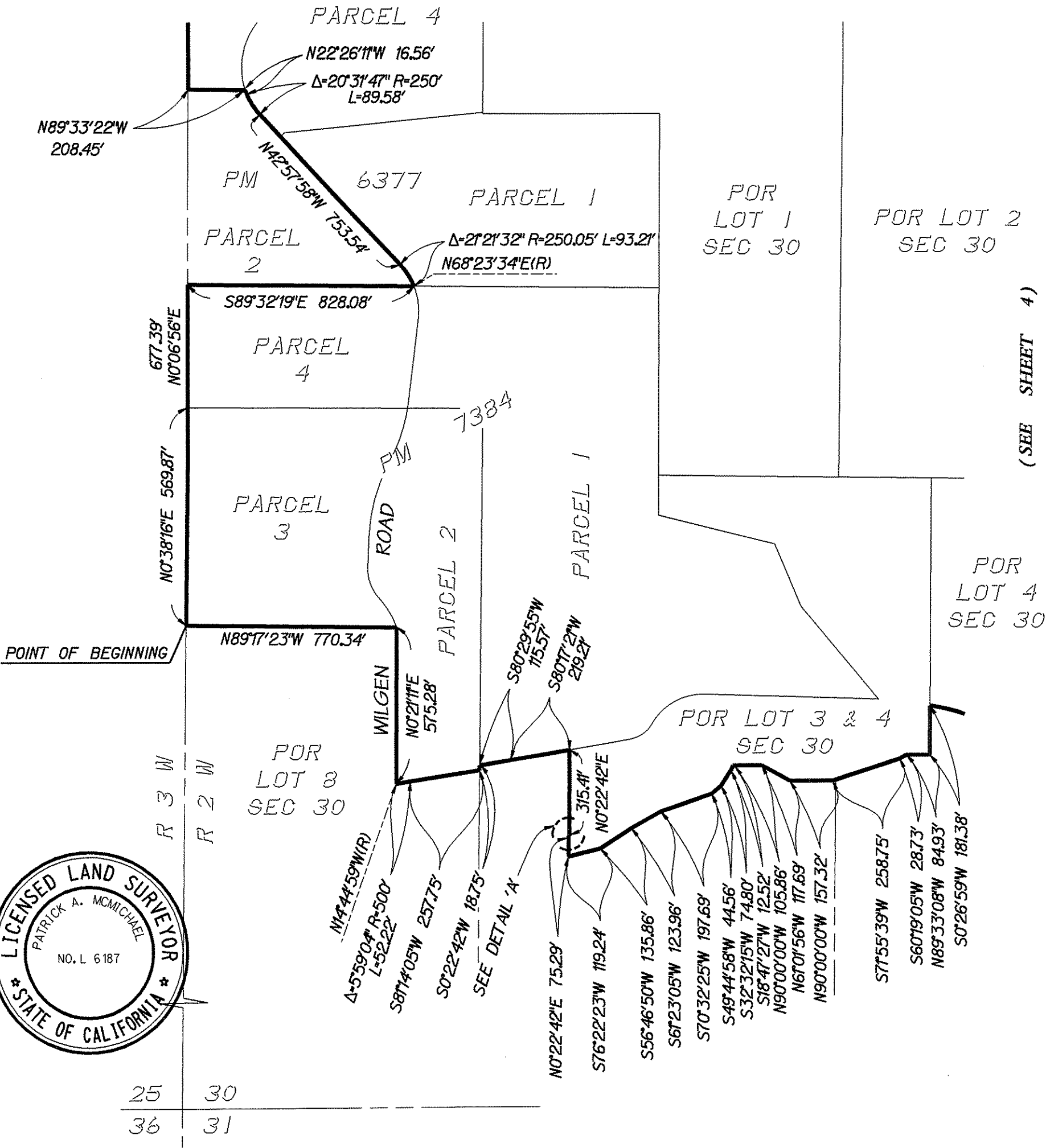
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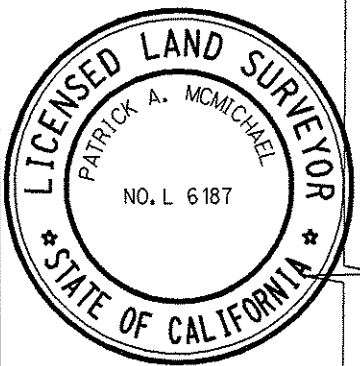
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(SEE SHEET 3)



(SEE SHEET 4)



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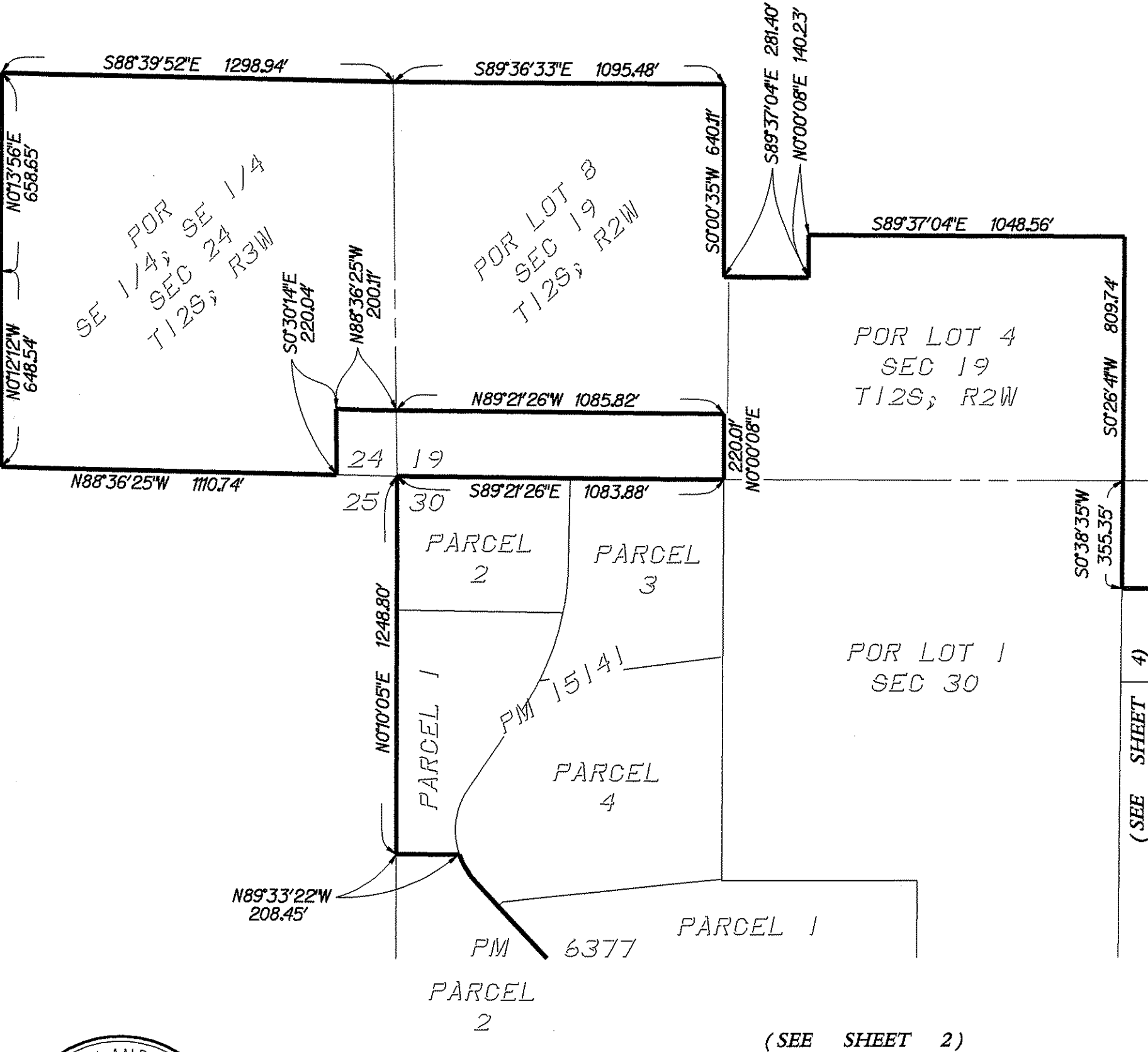
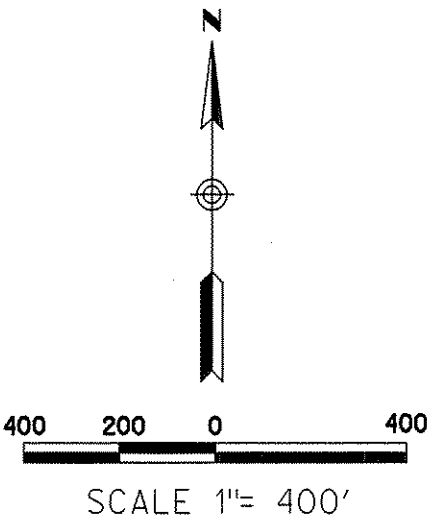
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EXHIBIT 'B'



SHEET 3 OF 4

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9-21-2010
DATE

**HARMONY GROVE
SEWER MAINTENANCE DISTRICT BOUNDARY**

EXHIBIT 'B'



400 200 0 400
SCALE 1"= 400'

(SEE SHEET 3)

POR
LOT 4
SEC 19
T12S, R2W

S0°26'41"W 809.74'

S0°38'35"W 355.35'

S89°45'07"E 1249.15'

S00°30'15"W 118.97'

S89°46'59"E 75.00'

S00°30'15"W 189.07'

N89°48'30"W(R)

N89°45'07"W 542.80'

NE 1/4
SEC 30

(SEE SHEET 3)

$\Delta=36^{\circ}06'14"$
R=283.95' L=178.93'

S35°54'44"E 53.74'

$\Delta=35^{\circ}32'59"$ R=500'
L=310.23'

S77°27'43"E 147.15'

$\Delta=77^{\circ}57'58"$ R=98.42' L=123.62'

POR LOT 1
SEC 30

POR LOT 2
SEC 30

COUNTRY CLUB DR.
S0°30'15"W 807.77'

S89°34'41"E 665.10'

S89°28'57"E 664.36'

N0°22'49"E 670.26'

POR
SW 1/4,
E 1/2,
NE 1/4,
SEC 30

S0°19'16"W 948.00'

SW 1/4,
SW 1/4,
NE 1/4
SEC 30

S42°01'17"W 122.70'
 $\Delta=32^{\circ}14'00"$
R=300' L=168.77'

POR
LOT 3 & 4
SEC 30

POR LOT 4
SEC 30

POR
NW 1/4,
SE 1/4,
SEC 30

(NS 298)
GROVE

ROAD
S9°41'17"W 748.04'

$\Delta=70^{\circ}00'00"$
R=150' L=183.26'

S0°26'59"W 181.38'

(RS-SC-1370)
HARMONY
N70°33'22"W 513.67'

S79°41'17"W 639.60'
 $\Delta=22^{\circ}38'00"$ R=300' L=118.51'
N32°50'43"W(R)

$\Delta=16^{\circ}04'00"$ R=425' L=119.18'

S47°05'17"W 78.70'

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S9°41'01"E(R)

SE 1/4
SEC 30

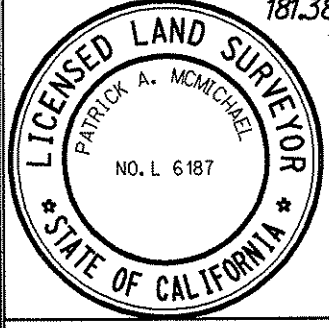
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S18°15'E(R)

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R=600' L=394.25'

N0°26'06"E 23.97'

$\Delta=11^{\circ}32'01"$
R=600' L=120.78'



SHEET 4 OF 4

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**HARMONY GROVE
SEWER MAINTENANCE DISTRICT BOUNDARY**

Patrick A. McMichael
PATRICK A. McMICHAEL, LS 6187
DATE 9.21.2010

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EXHIBIT 3

SAN DIEGO UNION TRIBUNE

SUPERVISORS OK HARMONY GROVE VILLAGE

By By: QUINN EASTMAN - Staff WritermidnightFeb. 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

<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

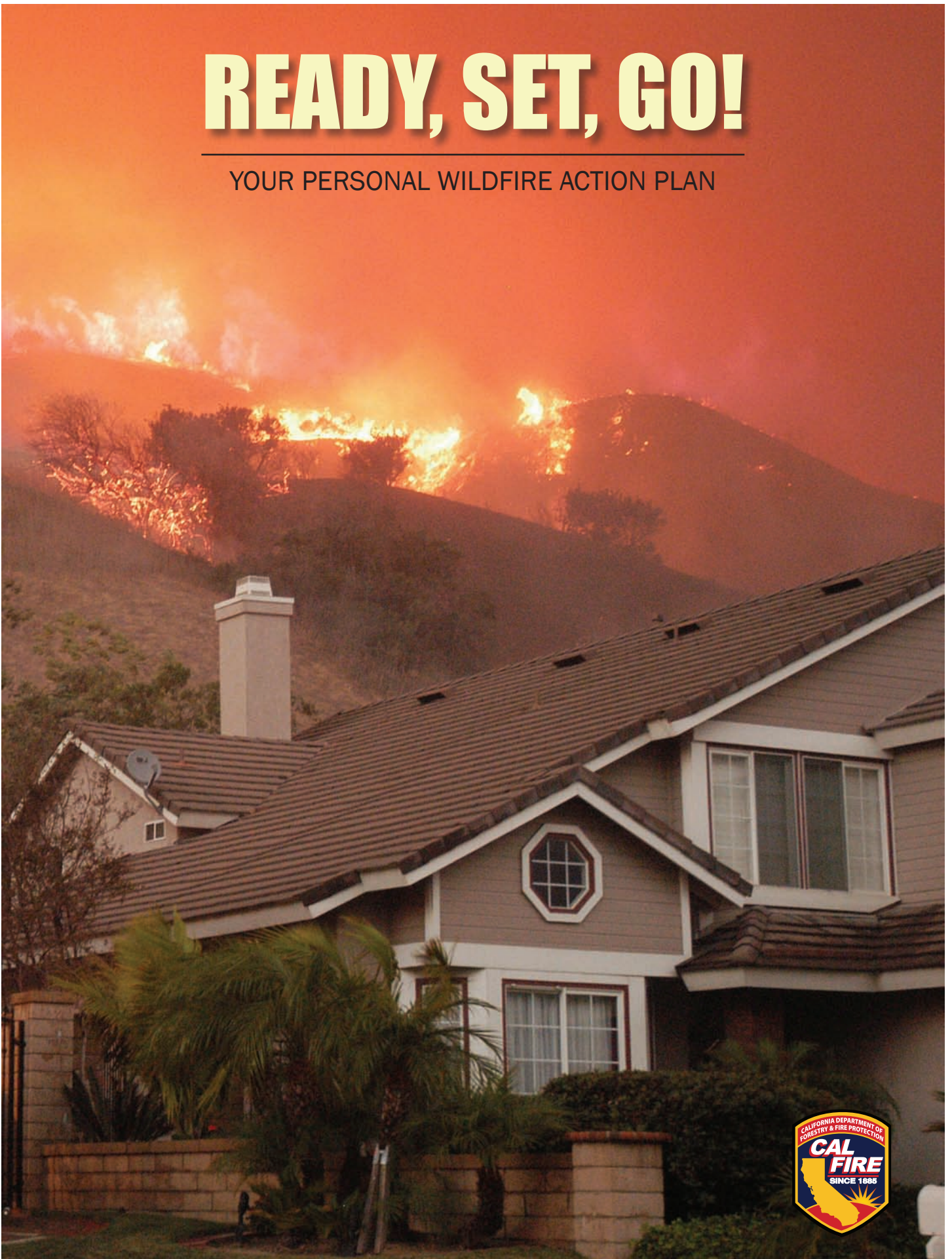
Responses to Letter O 3, East San Diego County Association of Realtors (cont.)

- 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



Wildfire 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.

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.

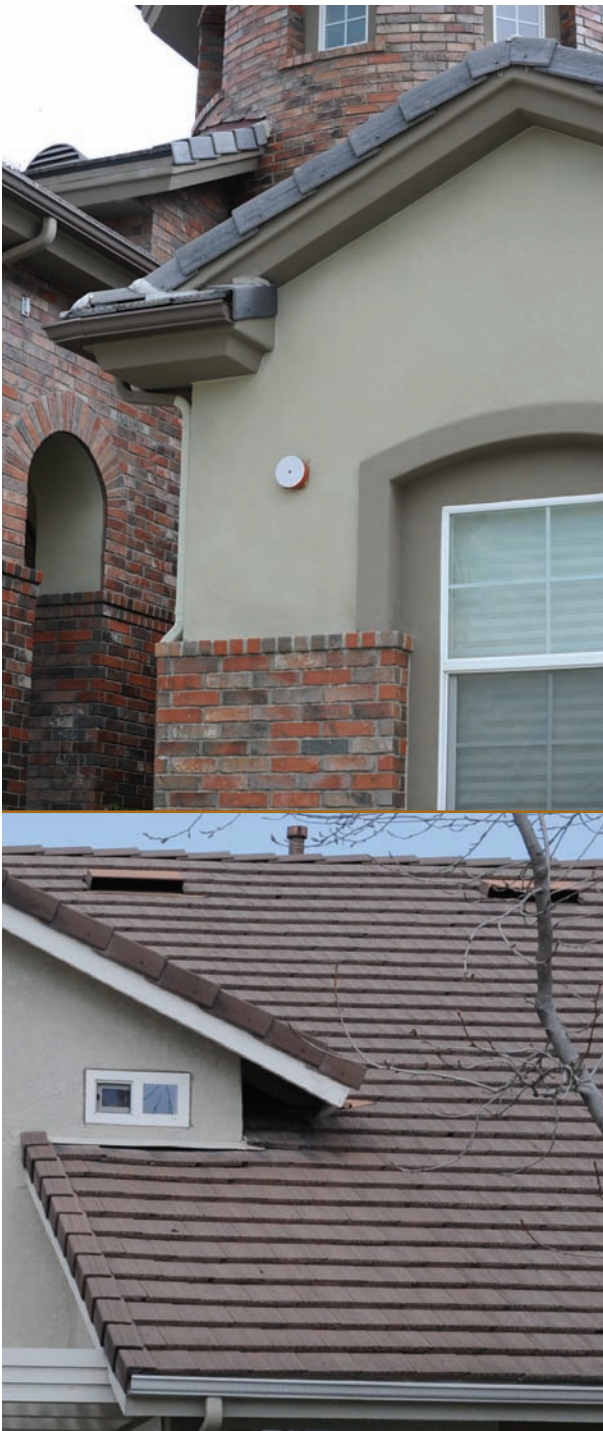
ZONE TWO

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

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

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

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

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

EMERGENCY SUPPLIES

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.

- ☐ 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



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.

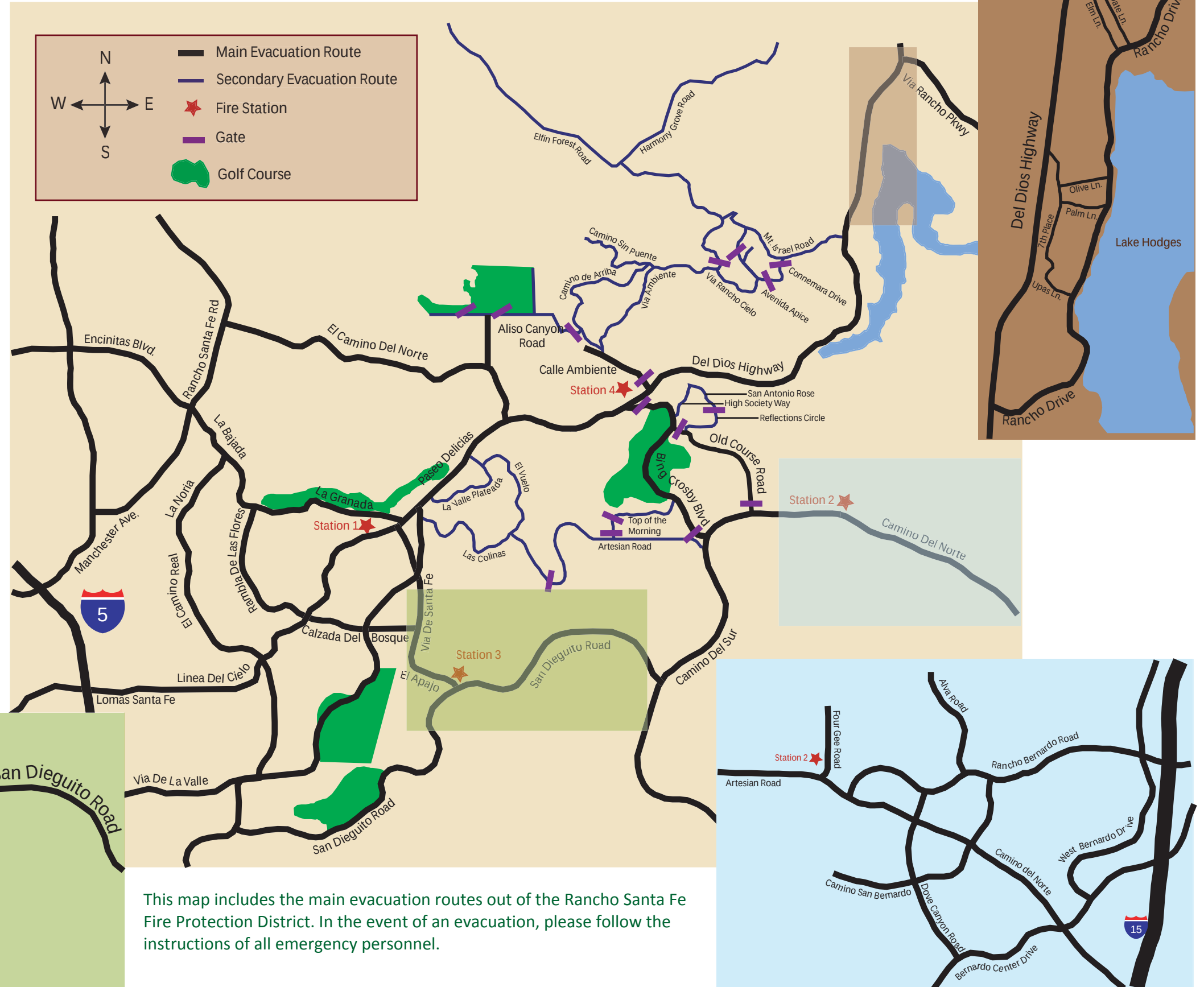
Relocate early enough to avoid being caught in fire, smoke or road congestion. Don't wait to be told by authorities to leave. In an intense wildfire, they may not have time to knock on every door. If you are advised to evacuate, don't hesitate!

“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.



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:



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

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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

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

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

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.

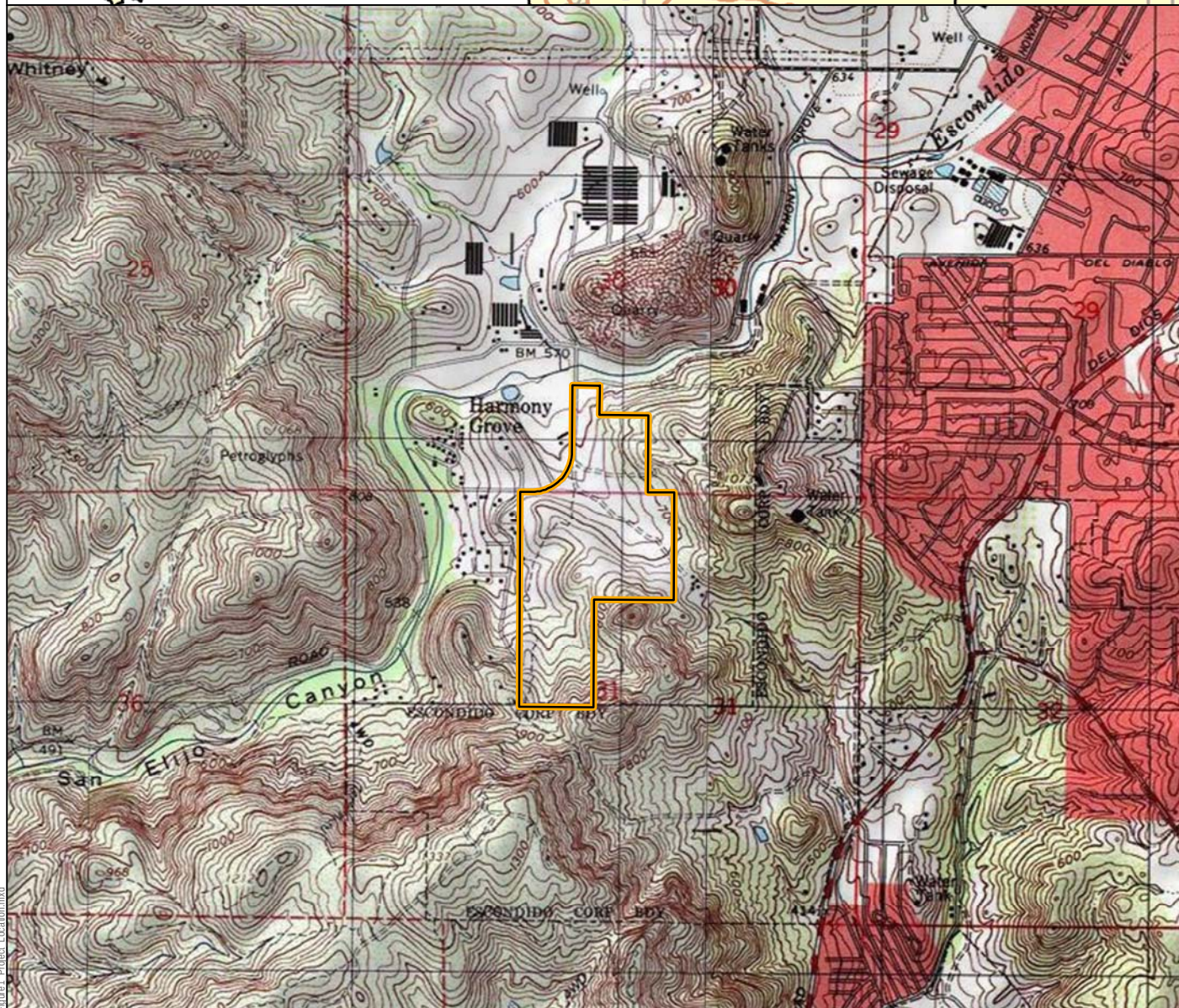
2.1.2 Project Description

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.

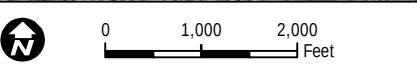
The project proposes:

- 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.



 Project Boundary



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Harmony Grove Village South Fire Protection Plan

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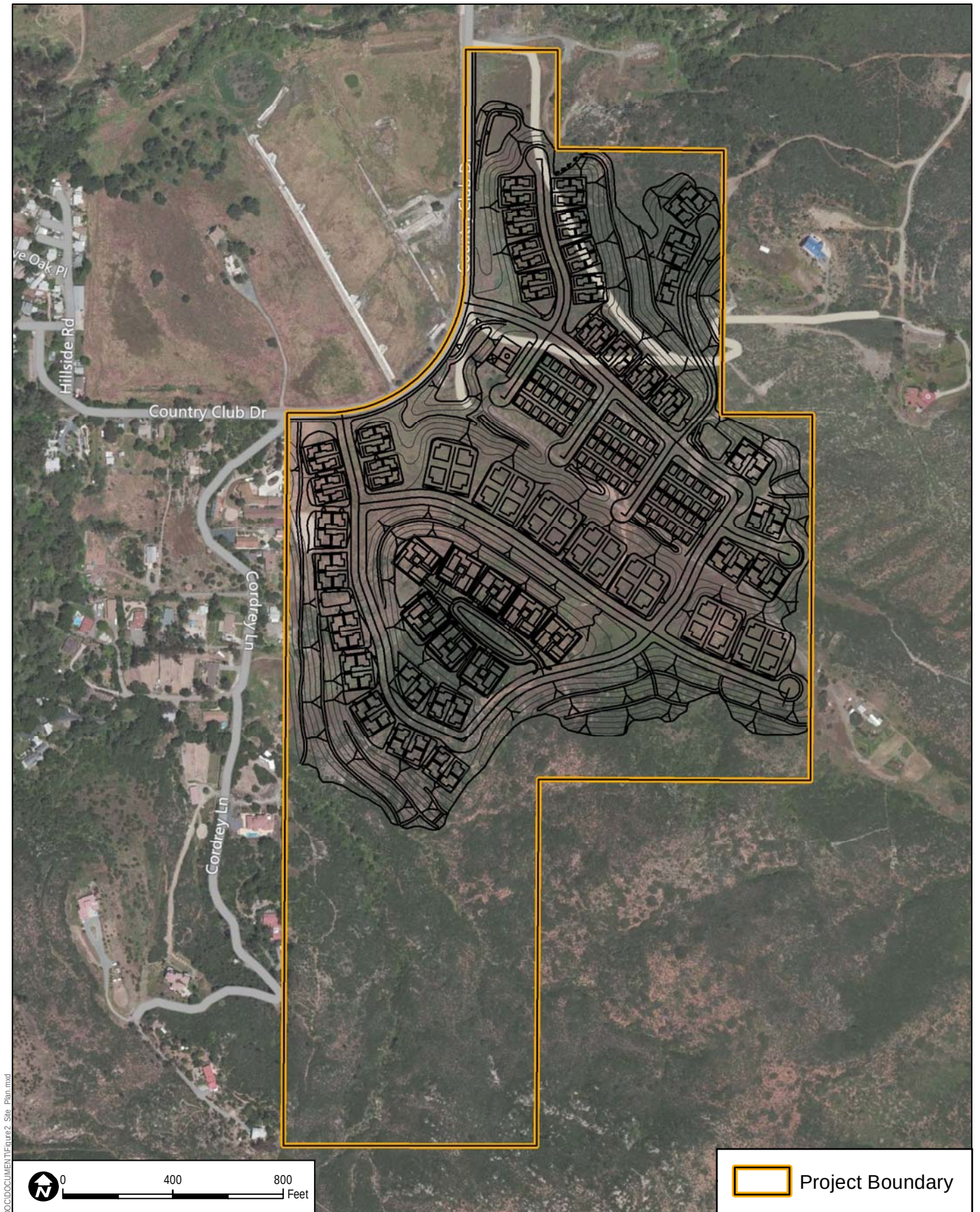


FIGURE 2
Site Plan

DUDEK

SOURCE: BING 2014, Hunsaker & Associates 2014

Harmony Grove Village South Fire Protection Plan

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Harmony Grove Village South Fire Protection Plan

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

Vegetation Community/Land Cover	Acres
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
Total	111.088

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.

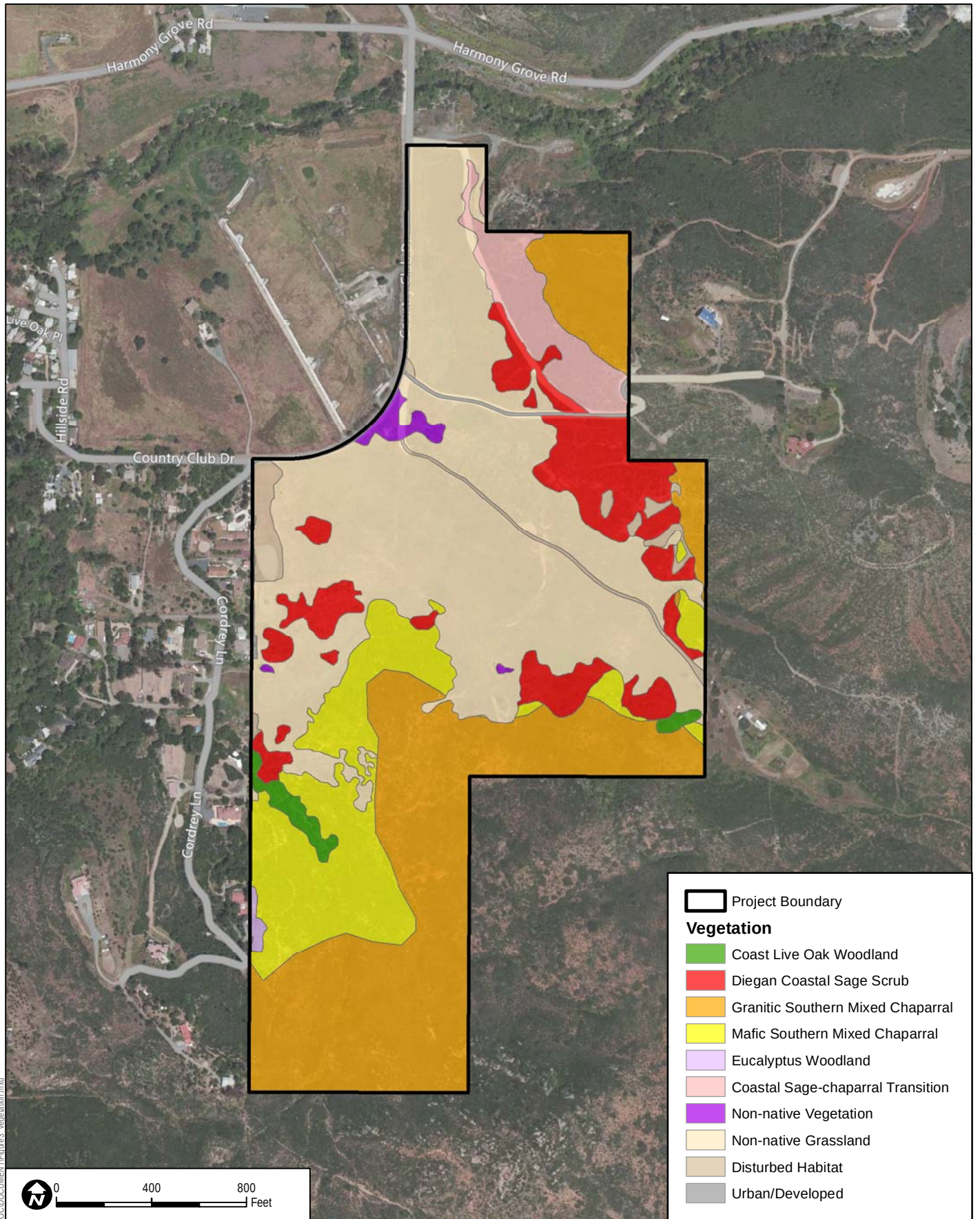


FIGURE 3
Project Site Vegetation

DUDEK

SOURCE: BING 2014, Helix 2014

8159

HARMONY GROVE VILLAGE SOUTH FIRE PROTECTION PLAN

Harmony Grove Village South Fire Protection Plan

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Harmony Grove Village South Fire Protection Plan

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

Vegetation Type	Location	Fuel Model Assignment
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

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

¹ *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

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.

Harmony Grove Village South Fire Protection Plan

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 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.

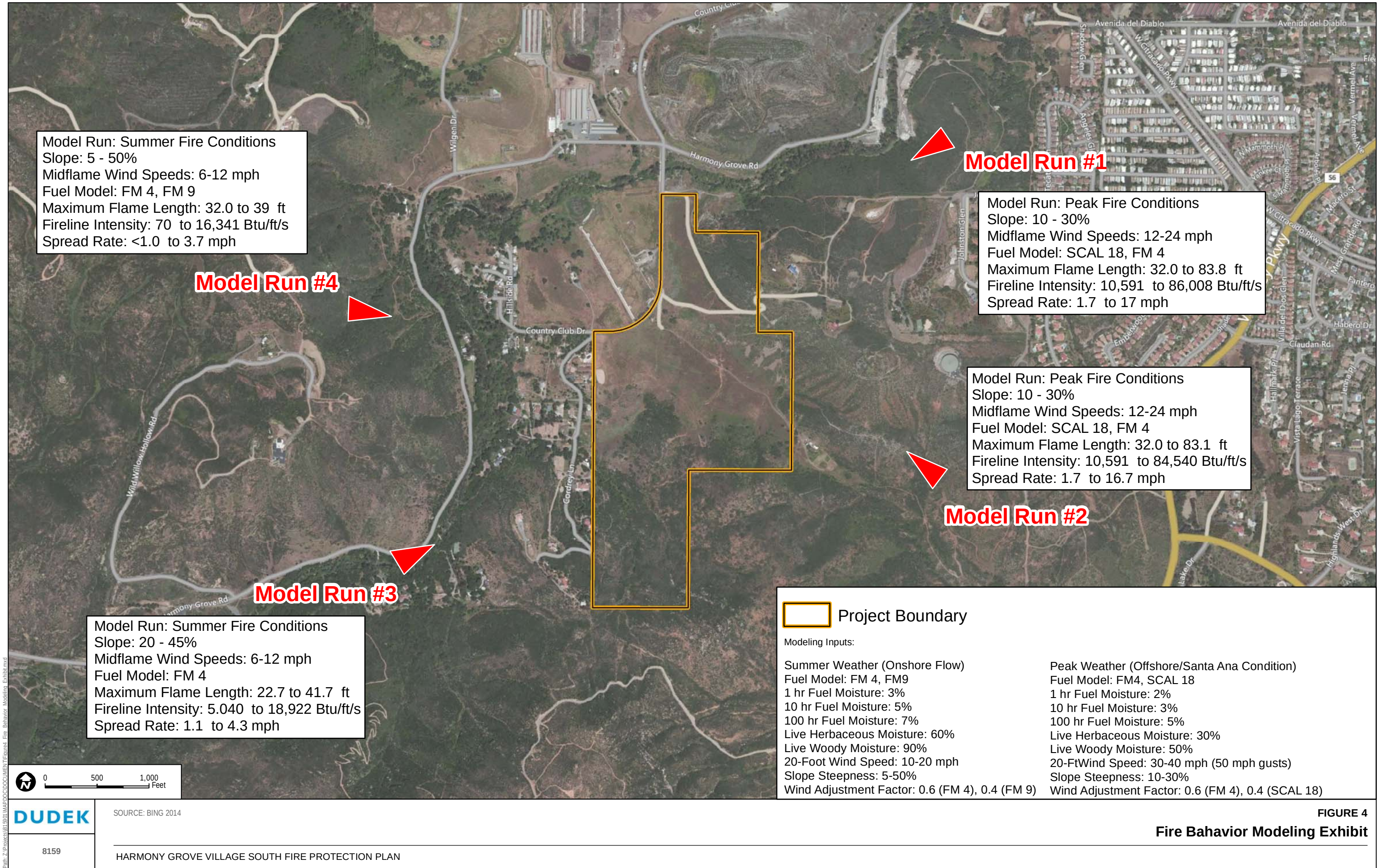
The unique terrain and fuel models used for BehavePlus modeling for the Harmony Grove Village South site are presented in Table 3, and the results of modeling efforts are provided in Table 4. Locations of BehavePlus model runs are presented graphically in Figure 4. Based on the BehavePlus analysis, worst-case 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 “chimneys¹.”

¹ 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.

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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 3rd 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 ⁽¹⁾
0–20	10 feet
21–40	20 feet
41+	30 feet

¹ 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 I). 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 3rd 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 3rd 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, Go²” 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.

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

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8 REFERENCES

- Alexander, M.E.; B.J. Stocks, B.M. Wotton, M.D. Flannigan; J.B. Todd; B.W. Butler, R.A. Lanoville. 1998. The international crown fire modeling experiment: an overview and progress report. In: Proceedings of the second symposium on fire and forest meteorology; 1998 January 12–14; Phoenix, Arizona. Boston, Massachusetts: American Meteorological Society; 20–23.
- Anderson, Hal E. 1982. Aids to Determining Fuel Models for Estimating Fire Behavior. USDA Forest Service Gen. Tech. Report INT-122. Intermountain Forest and Range Experiment Station, Ogden, Utah.
- Andrews, Patricia L., Collin D. Bevins, and Robert C. Seli. 2004. BehavePlus fire modeling system, version 3.0: User's Guide. Gen. Tech. Rep. RMRS-GTR-106 Ogden, Utah: Department of Agriculture, Forest Service, Rocky Mountain Research Station. 132p.
- Biswell, Harold H. 1989. Prescribed Burning in California Wildlands Vegetation Management. University of California Press, Berkeley and Los Angeles, California. 255 p.
- Butler, B.W., J. Cohen, D.J. Latham, R.D. Shuette, P. Spoko, K.S. Shannon, D. Jimenez, and L.S. Bradshaw. 2003. Measurements of radiant emissive power and temperatures in crown fires. Canadian Journal of Forest Research. 34:1577–1587.
- CAL FIRE. 2013. Fire and Resource Assessment Program. California Department of Forestry and Fire. Website access via <http://frap.cdf.ca.gov/data/frapgismaps/select.asp?theme=5>.
- Cohen, Jack D. 1995. Structure ignition assessment model (SIAM). In: Weise, D.R.; Martin, R.E., technical coordinators. Proceedings of the Biswell symposium: fire issues and solutions in urban interface and wildland ecosystems. 1994 February 15–17; Walnut Creek, CA. Gen. Tech. Rep. PSW-GTR-158. Albany, California: Pacific Southwest Research Station, Forest Service, U.S. Department of Agriculture; 85–92
- Cohen, J.D. 2000. Preventing disaster: home ignitability in the wildland-urban interface. Journal of Forestry 98(3): 15–21.
- Cohen, J.D. and B.W. Butler. 1996. Modeling potential ignitions from flame radiation exposure with implications for wildland/urban interface fire management. In: Proceedings of the 13th conference on fire and forest meteorology. October 27–31; Lorne, Victoria, Australia. Fairfield, Washington: International Association of Wildland Fire.

Harmony Grove Village South Fire Protection Plan

- Cohen, J.D. and J. Saveland. 1997. Structure Ignition Assessment Can Help Reduce Fire Damages in the W-UI. *Fire Management Notes* 57(4): 19–23.
- Cohen, Jack and Steve Quarles. 2011. Structure Ignition Assessment Model; The Origins and Basis of SIAM. From presentation at the 2011 NFPA Wildland Fire - Backyard and Beyond Conference in October 2011.
- Dennison, Phillip, Kraivut Charoensiri Dar A. Roberts, Seth H. Peterson, and Robert O. Green. 2006. Wildfire Temperature and Land Cover Modeling Using Hyperspectral Data. Center for Natural and Technological Hazards, University of Utah, University of California Santa Barbara and Jet Propulsion Laboratory. 36 pp.
- Foote, Ethan I.D.; Gilles, J. Keith. 1996. Structural survival. In: Slaughter, Rodney, ed. California's I-zone. Sacramento, California: CFESTES; 112–121.
- Helix Environmental Planning. 2014. Draft Vegetation Map for Harmony Grove Village South.
- Howard, Ronald A., D. Warner North, Fred L. Offensend, Charles N. Smart. 1973. Decision analysis of fire protection strategy for the Santa Monica mountains: an initial assessment. Menlo Park, CA: Stanford Research Institute. 159 p.
- Institute for Business and Home Safety (IBHS). 2008. Megafires: The Case for Mitigation. 48 pp.
- International Code Council, Inc. 2012. International Wildland-Urban Interface Code: Appendix G – Self-Defense Mechanism. April 2011.
- Manzello, Samuel, R. Gann, S. Kukuck, K. Prasad, and W. Jones. 2007. An Experimental Determination of a Real Fire Performance of a Non-Load Bearing Glass Wall Assembly. National Institute of Standards and Technology. 13 pp.
- NFPA 285. Standard Fire Test Method for Evaluation of Fire Propagation Characteristics of Exterior Non-Load-Bearing Wall Assemblies Containing Combustible Components. 2012 Edition.
- NFPA 1144. Standard for Reducing Structure Ignition Hazards from Wildland Fire. 2008. Technical Committee on Forest and Rural Fire Protection. Issued by the Standards Council on June 4, 2007, with an effective date of June 24, 2007. Approved as an American National Standard on June 24, 2007.
- Pyne, Stephen, Patricia Andrews, Richard Laven. 1996. Introduction to Wildland Fire, Second Edition. Chapter 1, Section 4. Pg. 21.

Harmony Grove Village South Fire Protection Plan

- Quarles, S.L. and F.C. Beall. 2002. Testing protocols and fire tests in support of the performance-based codes. In 'Proceedings of the California 2001 Wildfire Conference: 10 Years after the 1991 East Bay Hills Fire', 10–12 October 2001, Oakland, California. University of California, Forest Products Laboratory, Technical Report 35.01.462, pp. 64–73. Richmond, California.
- Quarles, Stephen, Yana Valachovic, Gary Nakamura, Glenn Nader, and Michael De Lasaux. 2010. Home Survival in Wildfire Prone Areas – Building Materials and Design Considerations. 22 pp.
- Ramsay, Caird and Lisle Rudolph. 2003. Landscaping and Building Design for Bushfire Areas. Chapter 2.
- Rothermel, R.C. 1983. How to Predict the Spread and Intensity of Forest and Range Fires. USDA Forest Service Gen. Tech. Report INT-143. Intermountain Forest and Range Experiment, Ogden, Utah.
- SANDAG. 2013. San Diego Association of Governments. Average persons per dwelling unit statistics. Website access: <http://www.sandag.org/>.
- San Elijo Conservancy. 2005. The Escondido Creek Restoration Action Plan. https://www.sanelijo.org/sites/sanelijo.org/files/Publications/Reports/Esc_Creek_Action_Plan.pdf
- Scott, Joe H. and Robert E. Burgan. 2005. Standard fire behavior fuel models: a comprehensive set for use with Rothermel's surface fire spread model. Gen. Tech. Rep. RMRS-GTR-153. Fort Collins, Colorado: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 72 p.
- Tran, H.C., J.D. Cohen, R.A. Chase. 1992. Modeling ignition of structures in wildland/urban interface fires. In: Proceedings of the 1st international fire and materials conference; 1992 September 24–25; Arlington, Virginia. London, United Kingdom: Inter Science Communications Limited; 253-262.
- University of California Agriculture and Natural Resources. 2011. Web Site: Builders Wildfire Mitigation Guide. <http://firecenter.berkeley.edu/bwmg/windows-1.html>
- Weise, D.R. and J. Regelbrugge. 1997. Recent chaparral fuel modeling efforts. Prescribed Fire and Effects Research Unit, Riverside Fire Laboratory, Pacific Southwest Research Station. 5p.

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

Participating Jurisdictions:

Carlsbad	National City
Chula Vista	Oceanside
Coronado	Poway
Del Mar	San Diego
El Cajon	San Marcos
Encinitas	Santee
Escondido	Solana Beach
Imperial Beach	Vista
La Mesa	County of San Diego
Lemon Grove	Rancho Santa Fe FPD



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.

Goal 1: Promote disaster-resistant future development.	
<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 8th, 2007 North County Times article covering the approval hearing (attached) where we clearly state that the only reason we were not opposing this massive development was that we trusted the Board to uphold the **Village Development Pattern (VDP)** throughout the valley, and restrict high urban density to the village core. The VDP provides for progressively less dense development the further from the core, and was the painstakingly negotiated compromise the community and County staff arrived at after five years of meetings, and adopted years ago by the residents of Harmony Grove, Elfin Forest, the San Dieguito Planning Group, the San Diego County Planning Commission, and County Staff.

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

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

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, reading "Melanie Fallon". The signature is fluid and cursive, with a small dot at the end.

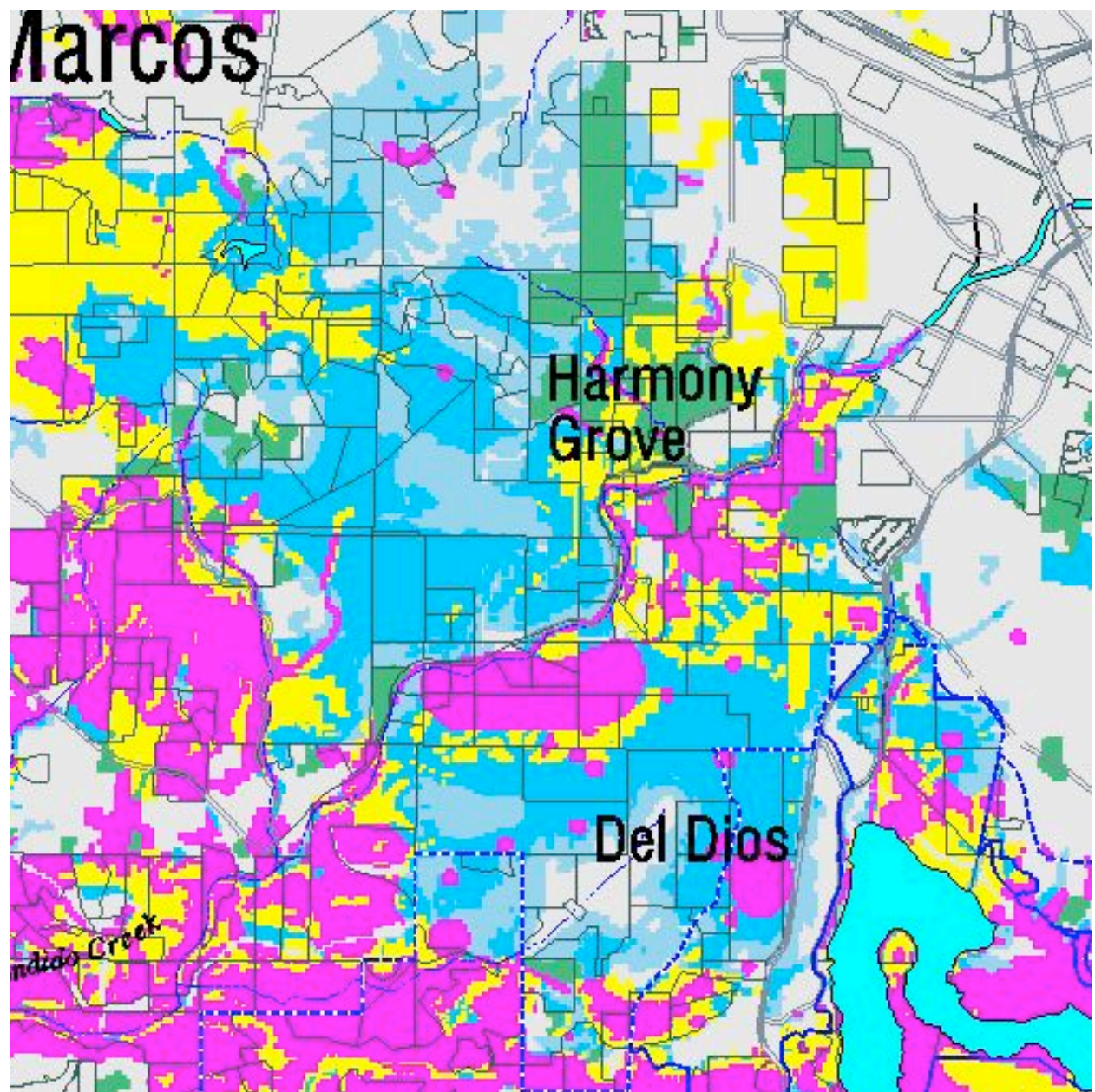
Melanie Fallon

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

**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.

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, its 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 be 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 'KB' with a stylized flourish.

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 Luiseno 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 Luiseno 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 and the last name "Lopez-Keifer" written in a continuous script.

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

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
To: [Eichar, Peter](#)
Subject: Harmony Grove Village South NOP comments
Date: Saturday, September 26, 2015 8:28:28 AM

September 25, 2015

Allen F. & Karen Binns
2637 Deer Springs Place
San Marcos, CA 92069
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 3rd project proposed as well as the 3rd 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

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

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
To: [Smith, Ashley](#)
Cc: [Eichar, Peter](#)
Subject: HGV South
Date: Monday, September 28, 2015 2:11:43 PM

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

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

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, to 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

Address

Elfin Forest A 92029
City State Zip Code

City

State

Zip Code

805-729-2259
Phone Number

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

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!

Kindest regards,
Dorcas Grove
WESTERN MEDICAL SOLUTIONS, INC.
800-406-2038 Ex 103
805-729-2250 Cell
760-796-0605 Fax
www.westernmedicalsolutions.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.

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 4th 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

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

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

MiraCosta College

eneubauer@miracosta.edu

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

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 and update your contact information accordingly****

From: Frauntene McLarney [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>
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, 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

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]-->o <!--[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]-->o <!--[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
Subject: comments on NOP for Harmony Grove Village South
Date: Monday, September 28, 2015 3:58:21 PM

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

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

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

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.

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.

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

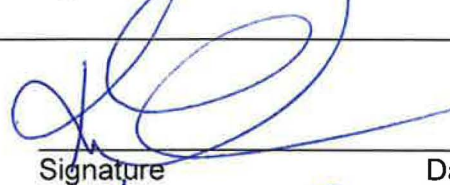
Community NOP Scoping Meeting
Wednesday, September 16, 2015
Elfin Forest Firehouse
20223 Elfin Forest Road
Elfin Forest, CA 92029

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

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

See attached.

(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

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

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 and update your contact information accordingly****

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 substantially 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
To: [Eichar, Peter](#); [Smith, Ashley](#)
Subject: HGVS NOP comments
Date: Monday, September 28, 2015 4:02:05 PM

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

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

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

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

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


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

Gungle, Ashley

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-TM-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 decisions 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 its urban sprawl, strip malls and terrible freeways, as much as we hated the Dodgers and Rams.

Development 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 destroyed.

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

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 and update your contact information accordingly****

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.

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,
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 Five 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

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

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

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

#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 ~~the~~ 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

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 Eljo

Promise of how I plan

up zone 2010

Riparian area Storm

w/ englemans oaks

+ ??

goes thru properties
check dens
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

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 26th 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