

**From:** phillauder

**Sent:** Tuesday, November 15, 2022 3:44 PM

**To:** Blom, Erica; Mumpower, Priscilla

**Subject:** [External] comment on draft Escondido MSR request for amendment

Dear Commissioners:

I'm not opposed to all development. I'm opposed to dumb development. Harvest Hills is a proposal for dumb development. Just look where it is! The issues of fire risk and evacuation alone make the project untenable.

That it would be recommended for "special study" status in the draft Escondido MSR seems absurd to me. I strongly object to such a recommendation. Harvest Hills is a dangerous project that threatens our region. At a minimum, it should not be given accommodation to be evaluated out of sync with the normal LAFCO process.

Please remove condition #9-B, special study status for Harvest Hills.

Thank you.

Sincerely,

Philip Lauder

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**From:** Lesley Handa

**Sent:** Sunday, November 27, 2022 2:59 PM

**To:** Blom, Erica; Mumpower, Priscilla

**Subject:** [External] Comment on draft Escondido MSR review, request for amendment

November 27, 2022

Dear Commissioners,

I'm writing to object to the recommendation for 'special study' status for Harvest Hills project in the draft Escondido MSR action. Harvest Hills is a dangerous project that threatens all of us who live and work in the region. The issues of fire risk and evacuation alone make this project untenable. At a minimum, it should not be given accommodation to be evaluated out of synch with the normal LAFCO process.

Please remove condition #9-B special study status for Harvest Hills. Thank you for your time and consideration.

Respectfully,

Lesley Handa  
Handa Ornithology Lab

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**From:** San Diego LAFCO <[Webmaster@sdlafco.com](mailto:Webmaster@sdlafco.com)>

**Sent:** Wednesday, November 30, 2022 9:10 AM

**Name**

Dan Silver

**Agenda Item #**

6a

**Do you Support or Oppose the Agenda Item?**

Oppose

**Comments or Questions on the Agenda Item**

Endangered Habitats League opposes Escondido Study Area No 1, an unwarranted and counterproductive special study area to fast-track and facilitate a particular development, called Harvest Hills. Particularly due to its unprecedented fire hazard and danger to surrounding communities, this project deserves a full and comprehensive review as part of the normal cycle of LAFCO sphere and service analysis. Adding language about evacuation is mere "window dressing," and does not substitute for proper scope of analysis. A gratuitous favor to a financial interest in the form of fast-tracking should not override the public interest in normal, comprehensive review. This special study area would violate the trust the public places in LAFCO.

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**From:** patricia borchmann

**Sent:** Wednesday, November 30, 2022 1:08 PM

**To:** Mumpower, Priscilla; Blom, Erica; Peters, Michaela A

**Cc:** patricia borchmann

**Subject:** [External] SOI Update on City of Escondido, Objection to "Special Study" status for Harvest Hills (Area 1), and Daley Ranch (former Sager Ranch) (Area 2)

LAFCO December 5, 2022, Objection to SOI Update on City of Escondido - Agenda 6a

LAFCO Commissioners,

On December 5, 2022, LAFCO will consider Agenda 6a, SOI Update for the City of Escondido, involving formation of 2 "Special Study" Areas to Escondido's sphere, and in doing so provide these areas eligibility to proceed in the next 5 years with an actual amendment, without necessitating a new municipal service review. This letter reflects vigorous public opposition.

It appears that despite strong public opposition to the previous proposal for an undeserved "special study" status for Harvest Hills to allow a streamlined entitlement process (former Agenda 9b), LAFCO still proposes the Commission consider a Sphere of Influence (SOI) Update for the City of Escondido,

which includes "special study" status for Harvest Hills (Escondido Study Area No. 1), and now also proposes new "special study" status for Daley Ranch (Escondido Study Area No. 2, formerly known as Sager Ranch). . On page 2, the Staff Report describes the Municipal Service Review and Associated Addendum on the Escondido Region, and indicates "Part Two" covers the City of Escondido and further divided between a comprehensive report prepared by Concordia Homes (Harvest Hills applicant), and an addendum prepared by LAFCO staff. Since the MSR (primary document) was prepared by Concordia, public stakeholders consider the MSR comprehensive report is not actually an objective analysis, and therefore it is highly unlikely that the MSR review actually provided an independent evaluation of availability, need, and sufficiency of affected agencies service functions relative to community needs, which is a public concern.

If the proposed MSR update is developed to modernize the process, with flexibility standards specifically designed to accommodate Harvest Hills, it appears the outcome could be an inferior process that cuts corners, and fails to address previous specific policy recommendations pertaining to extreme fire risks, and ignores the series of specific recommendations on the extreme fire threat at Harvest Hills and emergency evacuation capacity that were outlined in letter (dated September 6, 2022), which was co-signed by nineteen environmental organizations and conservation specialists who are independent experts.

I join other public stakeholders who object to another obvious attempt by Concordia, to force the Harvest Hills project through the 'back door', to obtain formal approval of a dangerous sprawl development project which couldn't be approved through the 'front door', by using a streamlined entitlement from LAFCO, taking steps out of sequence. using piecemeal analysis.. .

It is inappropriate for LAFCO as a Permitting Agency, to prematurely confer a formal land use entitlement on a controversial and incompatible leapfrog project reliant on an extreme density increase in the scenic San Pasqual Valley, which is currently zoned for low density, rural and agricultural uses only, on rugged terrain with sensitive habitat which is supposed to be protected as a Multiple Species Conservation Plan (MSCP). . The site contains biologically valuable un-fragmented habitat that is an active regional wildlife corridor used by many species, who would be displaced and suffer adverse impacts. Approval of overly lenient MSR standards , and "special study" status could preclude the eventual possibility that the Harvest Hills property could be potentially acquired for Open Space, as a Mitigation Bank for perpetual conservation, similar to Daley Ranch.

The project is incompatible with the tourism objectives at the adjacent San Diego Safari Park, a primary economic engine in the region, which generates major revenue in the area, and a business which contributes to quality of life for wild animals under its care, as well as quality of life for thousands of customers who visit. Economic impact cannot be overlooked, since the Safari Park also generates additional spin-off revenue elsewhere in Escondido, by local customers, and customers visiting from distant locations on vacation who occupy local hotels, and spend time and considerable money at local restaurants in Escondido. .

Harvest Hills is a dangerous sprawl development project that still has never even been formally approved by City of Escondido (Lead Agency), nor has the City ever released a Final EIR or Responses to Comments, much less ever issued a Certified EIR. Since the project submission in 2014, the technical CEQA documents are generally obsolete, grossly outdated, and unreliable. Since the site is located in a Very High Severity Fire Hazard Zone, and four independent fire experts specifically determined the Fire

Protection Plan proposed for Harvest Hills is unsafe, the Harvest Hills project is a gross public liability that does not deserve further consideration, or out of sequence approvals by LAFCO. The MSR update must integrate the September 6, 2022 letter co-signed by nineteen (19) environmental and conservation organizations, with detailed recommendations that specifically address important public concerns regarding extreme fire hazards associated with the incomplete Harvest Hills' Fire Protection Plan, and emergency evacuation deficiencies that are outlined in a series of attachments, which still remain unresolved at this time.

The MSR update must be consistent with the recent adoption on November 15, 2022 by County of San Diego Board of Supervisors of the Biodiversity Resolution that calls for better protection and access to the County's open spaces in support of biodiversity. The adopted Resolution also "aims to combat the climate crisis, advance equity by making it easier for all residents to access natural spaces, foster a spirit of ecological stewardship and purposeful green space into our built environment",

It is time for all public agencies with approval authority required for Harvest Hills project to fully recognize the project risks, technical and procedural inadequacies (including the major CEQA deficiency), and actually respond to the new public demand for the City of Escondido to formally DENY the project, and terminate any future consideration of Harvest Hills as a 'pipeline project'.

Copy: Councilmember Consuelo Martinez, City of Escondido  
Adam Finestone, City of Escondido Community Development (Planning Department)

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**From:** San Diego LAFCO

**Sent:** Wednesday, November 30, 2022 7:06 PM

**To:** Ngu, Dieu; Lockett, Tamaron; Blom, Erica

**Subject:** [External] \*NEW SUBMISSION\* Commission eComments or Call-in Request Form

**Name**

Laura Hunter

**Agenda Item #**

Item 6 A Escondido SOI

**Do you Support or Oppose the Agenda Item?**

Oppose

**Comments or Questions on the Agenda Item**

I continue to oppose the designation of a Special Study Area for Harvest Hills. A letter will be submitted from Sierra Club North County Group in opposition. This designation constitutes nothing more than a developer 'giveaway' for a dangerous project that will threaten our entire region, local residents, and the Safari Park. I ask, again, please remove the Special Study designation for Harvest Hills.

**From:** San Diego LAFCO <Webmaster@sdlafco.com>

**Sent:** Thursday, December 1, 2022 8:31 PM

**To:** Ngu, Dieu; Lockett, Tamaron; Blom, Erica

**Subject:** [External] \*NEW SUBMISSION\* Commission eComments or Call-in Request Form

**Name**

Pamela Heatherington

**Agenda Item #**

6a

**Do you Support or Oppose the Agenda Item?**

Oppose

**Comments or Questions on the Agenda Item**

Dear Commissioners, I oppose the creation of a Special Study area as part of the Escondido Sphere-of-Influence which would allow for early consideration, thus 'fast-tracking' for Harvest Hills. This project has unprecedented fire hazard risks and endangers on-site and surrounding communities. It threatens a globally significant endangered species facility and major economic driver for our region, the Safari Park. Please remove the special designation for Harvest Hills from the Escondido SOI.

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**From:** San Diego LAFCO <Webmaster@sdlafco.com>

**Sent:** Friday, December 2, 2022 3:19 AM

**To:** Ngu, Dieu; Lockett, Tamaron; Blom, Erica

**Subject:** [External] \*NEW SUBMISSION\* Commission eComments or Call-in Request Form

**Name**

Victoria Tenbrink

**Agenda Item #**

6a

**Do you Support or Oppose the Agenda Item?**

Oppose

**Comments or Questions on the Agenda Item**

With this special service area designation I'm seeing another attempt to fast-track development of Harvest Hills, which should be subject to even more scrutiny for the delivery of public services, not less. Escondido will not be free of the tremendous wildfire liability of this proposed development until that land is designated unsuitable for residential development.

**From:** San Diego LAFCO <Webmaster@sdlafco.com>

**Sent:** Friday, December 2, 2022 7:55 AM

**To:** Ngu, Dieu; Lockett, Tamaron; Blom, Erica

**Subject:** [External] \*NEW SUBMISSION\* Commission eComments or Call-in Request Form

**Name**

Ron Askeland

**Agenda Item #**

6a

**Do you Support or Oppose the Agenda Item?**

Oppose

**Comments or Questions on the Agenda Item**

Dear Commissioners, I oppose the creation of a Special Study area as part of the Escondido Sphere-of-Influence which would allow for early consideration, thus 'fast-tracking' for Harvest Hills. This project has unprecedented fire hazard risks and endangers on-site and surrounding communities. It threatens a globally significant endangered species facility and major economic driver for our region, the Safari Park. Please remove the special designation for Harvest Hills from the Escondido SOI.

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**From:** San Diego LAFCO <Webmaster@sdlafco.com>

**Sent:** Friday, December 2, 2022 8:01 AM

**To:** Ngu, Dieu; Lockett, Tamaron; Blom, Erica

**Subject:** [External] \*NEW SUBMISSION\* Commission eComments or Call-in Request Form

**Name**

Diane Nygaard

**Agenda Item #**

6a - Fast tracking Harvest Hills project

**Do you Support or Oppose the Agenda Item?**

Oppose

**Comments or Questions on the Agenda Item**

Fast tracking this project, given the well documented fire risks, would set a dangerous precedent and is contrary to the guidelines for carefully considering projects with such potential impacts.

**From:** Friends of Rose Creek <info@saverosecreek.org>  
**Sent:** Friday, December 2, 2022 8:40 AM  
**To:** Blom, Erica; Mumpower, Priscilla; Peters, Michaela A  
**Subject:** [External] Opposition to Item 6A for December 5th meeting

Dear Chair Jim Desmond and LAFCO Commissioners

The Friends of Rose Creek are writing today to ask you to **OPPOSE Special Study Designation** as part of **ITEM 6a** on the docket for the December 5, 2022 meeting.

We object to the recommendation for 'special study' status for the Harvest Hills project in the draft Escondido MSR action. Harvest Hills is a dangerous project that threatens everyone who live in the region including the threatened and endangered animals at the world-renowned San Diego Zoo Safari Park – a major regional employer that attracts upwards of 2 million visitors to the region each year. Impacts to the Safari Park are global in scope and taxes are regional in collection.

The issues of fire risk and evacuation alone make this project untenable. At a minimum, it should not be given accommodation to be evaluated out of synch with the normal LAFCO process.

Please remove condition #9-B special study status for Harvest Hills.

We fully support all the recommendations and comments of the North Country Group of the San Diego Sierra Club regarding the Harvest Hills project in their letters of December 1<sup>st</sup>, 2022 and September 6, 2022.

Thank you for your consideration.

Warmly,

**Karin Zirk, Ph.D. (she/her/hers)**  
**Executive Director**  
**Friends of Rose Creek**  
**\*\*\* Connecting Our Communities \*\*\***  
<https://SaveRoseCreek.org>

**From:** patricia borchmann

**Sent:** Friday, December 2, 2022 10:59 AM

**To:** Mumpower, Priscilla; Blom, Erica; Peters, Michaela; Adam Finestone; Consuelo Martinez; Paul McNamara

**Cc:** patricia borchmann

**Subject:** [External] Objection to Agenda item 6a, LAFCO December 5, 2022; "Special study" status for Daley Ranch

LAFCO Commissioners,

I join over 20 other public stakeholders who vigorously oppose LAFCO proposal to form a "special study" status for Area 2 for Daley Ranch (formerly known as Sager Ranch), and the related general rule exemption finding as lead agency covering all recommended actions.

Approval of LAFCO'S proposed "special study" status would '*provide these areas eligibility to proceed in the next 5 years with an actual amendment, without necessitating a normal new municipal service review*', This formal land use entitlement allows applicants the undeserved benefit of project streamlining, or fast-track processing. Additionally, the proposed general rule exemption would allow major development projects with destructive environmental impacts to proceed without the normal necessary environmental CEQA review process required to publicly disclose all adverse impacts in an Environmental Impact Report (EIR), or apply necessary Mitigation Measures to reduce significant adverse impacts.

*The proposed Daley Ranch project is expected to introduce an intensive new resort (with hotel), and a subdivision of 203 luxury homes into a remote area currently designated for rural residential use into a remote area which currently contains sensitive plant and animal habitat that should be protected and preserved by a Multiple Species Conservation Plan (MSCP). The draft MSCP is currently being developed for north San Diego County, which includes Escondido sphere of influence. Therefore, this LAFCO proposal presents a major conflict, since countless public stakeholders form an important community of interest who strongly value the existing natural habitat and open space, and who collectively oppose the LAFCO adoption of the general rule exemption, as currently proposed. .*

The scope, scale and intensity of proposed density increase, and conversion to commercial use for resort area present exceptions to to the normal CEQA process that are unacceptable, since adverse impacts are expected to cause irreparable harm, and permanent damage to existing sensitive plant and animal species, and interference with the existing regional wildlife corridors used by many sensitive animal species that will be displaced, and their survival will be threatened.

*On Page 3 of the Staff Report, the last paragraph indicates that Escondido determined '**these lands are also located beyond the current range of the City's existing infrastructure**'. On Page 4, the Staff Report indicates 'Escondido Study Area No. 2 Daley Ranch includes 1,783 acres, and the Daley Ranch project application was filed with the City in 2018, which involves development of a resort and residential areas, with the latter involving a 203 lot subdivision on approximately 200 acres.*

Public stakeholders assert that LAFCO approval of the two "special study" status areas as currently proposed would manifest a gross abuse of LAFCO's broad discretion in designating spheres in

step with meeting its objective to facilitate orderly and responsive growth and development, so long as following factors are considered:

- . *Present and planned land uses in the area, including agricultural or open space lands.*
- . *Present and probable need for public facilities and services in the area.*
- . *Capacity of public facilities and adequacy of public services the agencies provide.*
- . *Existence of any social or economic communities of interest.*
- . *Present and probable needs for water, wastewater, and fire protection for any disadvantaged communities within the agency's sphere.*

Public stakeholders consider the proposed Daley Ranch 'special study' status does not represent, or meet an objective definition of **orderly growth and development**, based on the following facts:

- . The remote rural location is not infill development, and special study areas are located beyond the current range of the City's infrastructure.
- . Neither the proposed 203 lot subdivision, or the resort are expected to provide any affordable housing, or units occupied by low income households.
- . The intensive uses proposed for a resort and a 203-lot subdivision of luxury homes are expected to demand maximum water consumption, which is likely unsustainable due to the current chronic drought condition, and projection for prolonged water supply deficiency in California.
- . The intensity of traffic generated by the resort, and 203-lot subdivision of luxury homes are expected to exceed the Vehicle Miles Traveled (VMT) threshold formula, to qualify for CEQA exemption to waive traffic analysis.
- . Preliminary project details projected signalization of new intersection of off-site access roadway which connects drivers to enter/exit project on Valley Center Road, which will reduce levels of service, and cause dangerous conditions on a steep, high-speed segment of highly traveled roadway.
- . Further, designation of the Special Study Areas for development that will cost the city and further deplete its budget, is of continued concern now that it appears the Escondido sales tax measure has failed.

For these reasons, many stakeholders consider the LAFCO proposal to designate 2 'special study' status areas is inappropriate, and a gross abuse of LAFCO's broad discretion. It appears that reasonable arguments are made here, which do not sufficiently support LAFCO findings, recommendations, or entitlement to apply the general rule exemption from CEQA.

Countless residents in Escondido, and north San Diego County who will be adversely impacted by LAFCO's proposed action implore Commissioners to apply objective decision-making skills, instead of surrendering your own judgment to arguments presented by attorneys and consultants retained by applicants.

Thank you for thoughtful consideration.

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**From:** San Diego LAFCO <[Webmaster@sdlafco.com](mailto:Webmaster@sdlafco.com)>

**Sent:** Friday, December 2, 2022 12:21 PM

**To:** Ngu, Dieu; Lockett, Tamaron; Blom, Erica

**Subject:** [External] \*NEW SUBMISSION\* Commission eComments or Call-in Request Form

**Name**

Kevin Kearney

**Agenda Item #**

6a

**Do you Support or Oppose the Agenda Item?**

Oppose

**Comments or Questions on the Agenda Item**

Dear Commissioners, I oppose the creation of a Special Study area as part of the Escondido Sphere-of-Influence for Harvest Hills. It is not right to build on dangerous fire-hazard land, and it is not right to destroy endangered plant species. Escondido must fast track more dense, in-fill development. I am so proud to work in North County at Palomar College, and I am so proud to serve Escondido. Please keep Escondido and North Country safe and beautiful for all.



December 1, 2022

Chair Jim Desmond and LAFCO Commissioners  
San Diego LAFCO  
Via Email [michaela.peters@sdcounty.ca.gov](mailto:michaela.peters@sdcounty.ca.gov)

**RE: ITEM 6a: OPPOSE Special Study Designation ITEM 6a December 5, 2022 meeting**

Dear Chair Desmond and Commissioners:

Sierra Club North County Group (NCG) is writing today to repeat our opposition to designation of a Special Study Area for Harvest Hills as part of your action on the Escondido SOI. Over 20 organizations and numerous residents have already written LAFCO in opposition to this action.

All of the many issues outlined in the September 6, 2022 letter (attached) are still valid and support opposition to this designation.

In addition, the staff report (page 3) notes that there is a 1,000 acre reduction proposed in the Escondido SOI due, in part because, ***“...lands are located beyond the current range of the City’s existing infrastructure.”*** (emphasis added). This statement is also true for the lands proposed to be annexed for Harvest Hills. The Harvest Hills lands are **far beyond** the City’s range of infrastructure. It makes no sense to expand the SOI into lands with the very same conditions for which the city is shrinking it.

Further, designation of the Special Study Areas for development that will cost the city and further deplete its budget, is of continued concern now that it appears the Escondido sales tax measure has failed.

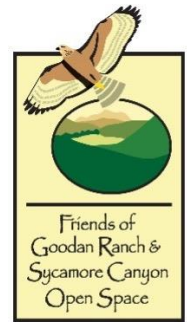
In addition, the County’s comment letter dated October 21, 2022 outlined and requested many extant policies from its General Plan to be included in the MSR. However, these were not. The County letter states, *“The County finds that the omitted land use, conservation, and open space policies in the County’s General Plan are relevant, given the existing interface between urban and non-urban uses along the jurisdictional boundary between the County and the City. Identification and inclusion of these policies into the MSR Report is essential to render a decision on the proposed LAFCO recommendations.”* (County letter at 1) The Escondido MSR should be amended to include this request from the County and remove the Special Study Area.

In conclusion, Sierra Club NCG continues to oppose the Escondido Special Study area which would allow for early consideration, thus ‘fast-tracking’ for a specific speculative development (Harvest Hills). The record contains abundant information that this project has an unprecedented fire hazard risks and endangers on-site and surrounding communities. It threatens a globally significant endangered species facility and major economic driver for our region, the Safari Park.

**We urge you to safeguard our region and remove the Special Study area for Harvest Hills.**

Thank you for your consideration,  
*Laura Hunter*, Chair  
Sierra Club NCG Conservation Committee

Attch September 6, 2022 NGO comment letter opposing Special Study Area for Harvest Hills



September 6, 2022

Chair Desmond and Commissioners  
Mr. Keene Simonds  
Ms. Priscilla Mumpower  
LAFCO  
Via Email

**RE: Opposition to special consideration for Harvest Hills in Escondido MSR**

Dear Commissioners, Mr. Simonds, and Ms. Mumpower:

The undersigned organizations are submitting this comment letter to urge the removal of staff recommendation 9 (b) of the draft Staff Addendum to the Escondido MSR.

It is unusual and concerning that the proponent of Harvest Hills was secured to write the MSR for the entire city of Escondido. That said, we support the wisdom of the staff addendum in rectifying the deficiencies in the Concordia proposal.

However, making the accommodation provided in 9 (b) is unacceptable. A 'special study' designation would allow the project to be brought forth out of synch with the normal comprehensive LAFCO sphere and services analysis and is tantamount to fast-tracking this complex and dangerous project. It is inappropriate and contrary to the public interest.

The 9 (b) recommendation reads:

*9. ... b) Notwithstanding other determinations, San Diego LAFCO should proceed to establish one or more special study areas for the City of Escondido sphere of influence as part of a limited update and provide the affected areas eligibility to proceed in the next five years with an actual amendment without necessitating a new municipal service review. This includes a special study area for the Harvest Hills (previously Safari Highlands) project site.*

**We request that staff recommend and the Commission eliminate recommendation 9 (b) from the staff addendum.**

There are several existing conditions with this project proposal that require it to follow the normal LAFCO review process. These are discussed below:

**A. Harvest Hills would result in a major impact on the region and the City, and must have a full and comprehensive analysis prior to any SOI adjustment or annexation.**

Harvest Hills is one of the most dangerously located development projects in the region, and probably the state. It has had more than enough time (eight years since first proposed as Safari Highlands Ranch in April of 2014 and 20 years since Valley View Estates) to complete the process. The failure of the development interests to bring this project forward in a timely manner should not be rewarded with special consideration that, effectively, reduces the comprehensiveness of the analysis required.

A major change in municipal services, such as would be required for the Harvest Hills project, should be part of a comprehensive services and sphere review rather than considered in a piecemeal fashion.

This project, and others before it, have failed to advance over a multi-decade period for good reasons. The location for a sprawl project like this is infeasible and indefensible.

The reasons for this include recent information on the project's insurmountable fire and evacuation issues. There is even more evidence of the severe threat that this project would pose to existing neighbors and neighboring communities, including the San Diego Zoo Safari Park. Under these circumstances, waiting for the next comprehensive review is eminently justified and should be required.

**B. New analyses demonstrate excessive fire and evacuation danger from project.**

Four expert reports and reviews clearly demonstrating the significant fire threat of Harvest Hills are attached for your convenience and summarized below. We request that these be included in the record and reflected in the analysis of staff final recommendation.

**1. Fire Risk Assessment of Harvest Hills, August 26, 2021. Rohde and Associates**

This report was commissioned by the City of Escondido for a fire risk assessment of the project and analysis of Harvest Hills' proposed Fire Protection Plan. They found the plan's proposed evacuation strategies deficient and the tenuous 'shelter-in-place' strategy unworkable.

Many concerns are raised in this assessment. Here are just a few:

- Proposed secondary access road is not in compliance with standards.
- Significant hazards for public use during wildfire have been identified with the proposed routes in this study.
- Numerous studies have identified that human wildfire ignition is directly tied to population growth and is an inescapable outcome of any development in the Wildland-Urban Interface.
- Lack of a certified traffic study.
- Lack of a specific, detailed evacuation plan.
- Shelter-in-place provisions are inadequate.
- Expected fire behavior that is likely to overwhelm the evacuation routes given topography.
- Inadequate fuel reduction zones.
- Consideration of 'in-street' refuge should not be considered for the public.
- **Significant areas of concern exist for both proposed emergency evacuation routes.** Both routes travel through and across steep terrain with moderate to heavy fuels. Neither route is developed to municipal road standards and travel safety, especially during presence of fire or smoke, will likely be hazardous.
- Outputs from these studies indicate potential for extreme fire behavior and rates of spread for both onshore and offshore wind driven fires at the project site; wind gusts in the area have reached 100 mph in past fires.

Although Rohde made several recommendations, they would be very costly and have not been evaluated in any of the environmental review for this project. Further, as the next report demonstrates, the recommendations do not resolve the problems noted.

2. **Harvest Hills Evacuation Plan Review** by Neal Liddicoat<sup>1</sup> of Griffin Cove Transportation Consulting, February 17, 2022.

This analysis looked at five fire documents<sup>2</sup> evaluating the effectiveness of the proposed plans and analyzed several evacuation scenarios. The findings of the proposed Harvest Hills analysis showed many additional deficiencies including:

- The roadway capacity assumptions are substantially flawed and, specifically, they overstate the capacity of the evacuation roadways.
- The travel speeds assumed in the analysis are unsupported by facts or analysis.

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<sup>1</sup> Mr. Liddicoat is a licensed civil engineer with a particular expertise in the analysis of traffic operations at major event centers, at which large volumes of traffic arrive and depart in short periods of time such as event centers, amusement parks, and convention centers. As traffic operations principles in these analyses are similar to those that apply to wildfire evacuation planning, he is frequently retained to provide expert comments on the evacuation effects of large-scale residential and mixed-use projects,

<sup>2</sup> Dudek, *Fire Protection Plan* (Dec. 2020, Dudek *Evacuation Analysis Memo*, Jan. 16, 2020; LLG *Road Capacity Assessment Memo*, Oct. 10, 2019; LLC *Travel Time Calculation Assumptions*; Rohde *Fire Risk Assessment* prepare for City of Escondido.

- The methodology used to derive travel times was flawed and represents a failure to understand the basic characteristics of traffic flow, particularly under conditions when traffic demand exceeds the capacity of a road. The methodology further fails to represent an understanding of traffic flow when drivers are under extreme duress, as they would be during a wildfire evacuation.
- The analysis includes traffic only from the proposed Project and nearby communities; it ignores ambient traffic that is already on the area road system at the time an evacuation is ordered, as well as other evacuating traffic, such as vehicles departing Ramona along State Route 78 (SR 78).
- The evacuation times presented are incomplete and misleading, as they ignore pre-evacuation notification and preparation time.
- Insufficient consideration has been given to the potential for the northern segment of the Project to be cut off from safety by a fire encroaching on the middle segment of Safari Highlands Ranch Road.
- Topography in the area would favor rapid fire spread, increasing the chances of Safari Highlands Ranch Road and the proposed northern evacuation route being cut off.

The findings of the GCTC Revised Evacuation Traffic Analysis include:

- None of the evacuation scenarios provide sufficient road capacity to allow for safe evacuation of Harvest Hills or nearby communities
- Evacuation traffic demand will exceed road capacities by as much as 54%
- If SR 78 traffic is included, demand will exceed capacity by up to 64%
- Simultaneous evacuation of Ramona would potentially overwhelm SR 78, consuming all available capacity
- Drivers evacuating via Zoo Rd. will have extreme difficulty entering SR 78 flow
- Traffic flow on evacuation routes will be unstable and susceptible to major disruptions
- Significant congestion & stop-and-go operation will prevail
- Safari Highlands Ranch Rd. passes through an area with steep slopes potentially increasing the odds of road being cut off by fire

We direct your attention to Attachment 1 of this memo which clearly demonstrates that in every scenario, **even with** the Rohde recommendations, traffic capacities and volumes are exceeded, meaning ... *none of the evacuation scenarios provide sufficient road capacity to allow for safe evacuation of Harvest Hills or the neighboring communities.*

Last, stranding of future residents within the project is a critical concern. GCTC found:

*A significant risk exists that residents in the northern portion of the Project could be stranded with no means of escape if fire encroaches upon the middle segment of Safari Highlands Ranch Road. That road passes through an area with challenging topography, potentially increasing the odds of the road being cut off by fire. This is a particular concern given that a fire risk assessment commissioned by the City of Escondido specifically recommended that the proposed north evacuation route not be included in the evacuation road system.*

It is clear the current northern evacuation route is unworkable, which leaves the project without a viable second evacuation route.

**3. A Memorandum from Chief Rick Vogt in response to the Rohde Assessment listing nine major areas of concern. September 21, 2021**

Chief Vogt's memo, attached, requests nine major areas be addressed, including identifying if a source of sustainable funding exists to staff a fully functional municipal fire station.

**4. Review of Fire Safety Engineering Issues Presentation, March 3, 2022, by Joseph B. Zicherman<sup>3</sup>, Ph.D., SFPE, Berkeley Engineering and Research**

Dr. Zicherman's review of the plans yielded comparable concerns about evacuation and highlighted additional fire-related issues as well. His review of the DEIR the fire evacuation plan found:

- Dependence on these tortuous and unfamiliar private roads as emergency routes and ensuring their availability to evacuate the project is inconsistent with reasonable minimum safety standards.
- Dependence on unfamiliar and irregularly routed roads for evacuation which can take place in darkness and/or with smoke obscuration and reduced visibility are extremely likely to result in injuries and loss of life.<sup>4</sup>

His recent findings included:

- Project site is a high hazard area with a verified risk of repeated wildland fires.
- The project would be built at a site with a 1,400 foot elevation gain – which on a macroscale supports accelerations of wind that are far greater than accelerations and flame-lengths affecting lesser slopes.
- Beyond unfavorable traffic flow analysis during emergency situations, project design with separate pods of homes connected by a single two-lane road creates a highly dangerous situation of potential entrapment during fire events.
- A single accident would cut off northerly areas of project from the southerly areas.
- Other factors of note include the following:
  - Road-width issues
  - Roads between neighborhoods follow surface contours made necessary by project topography and as a result are irregular with twisted contours.
  - Evacuation routes would be unfamiliar to drivers. Some would be on private roads, inaccessible during normal times and therefore unfamiliar during emergencies.
  - Smoke obscuration along unfamiliar roads would make matters worse. Additionally, a single vehicle accident resulting from drivers attempting to evacuate on unfamiliar roads in exigent circumstances could block the 2-lane evacuation route and leave many evacuees trapped.

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<sup>3</sup> Dr. Zicherman is a leading scientist specializing in the fire performance of materials and systems. His analyses have been used to guide policy for the California Department of Forestry and Fire Protection.

<sup>4</sup>Review of Safari Highlands Ranch EIR of October 2017 <https://www.spvpa.org/wp-content/uploads/2018/01/Zicherman-Report-and-CV-2017-12-27.pdf>

- Availability and maintenance of Fire Department and other first responder ingress is questionable during a foreseeable wildland fire.
- Shelter in place proposals are not adequate for foreseeable numbers of residents and emergency flows of residents, pets, and vehicles.
- Suggestions that the proposed shelter in place safe havens will provide fail safe areas of refuge are not supported by project concepts or in project design.
- Consumer products and furnishings cannot be regulated and pose serious ignition hazards from flying embers.

Finally, Dr. Zicherman stated that:

- Project has highest level of fire risk seen by reviewer in any area in Northern or Southern California.

This statement by a very experienced fire analyst should be meaningful to LAFCO.

**C. Evacuation with a high number of animal trailers coming from San Diego Zoo Safari Park and the San Pasqual Valley Ranch Horse stables has not been fully accounted for.**

While assumptions have included an average or assumed amount of animal trailers, none have fully assessed the potential impact of the evacuation of 3,600 endangered and other animal species from the 1,800-acre San Diego Zoo Safari Park and horses from the San Pasqual Valley Ranch, a large horse boarding and training center nearby.

**D. Harvest Hills is not ‘orderly’ development and does not comply with Govt. Code 56301.**

The justification at the August 1, 2022 hearing for considering Harvest Hills out of process in the name of LAFCO’s role of ensuring ‘orderly development’ was misleading. Harvest Hills is one of the worst examples of urban sprawl in the County. There is no scenario under which this project can be considered 'orderly formation and development'. While municipal annexation of unincorporated islands and consolidation of areas adjacent to existing urban development is ‘orderly’ under many circumstances, in this case the term is inapplicable. The site is a *leapfrog development* away from urban areas, jumping over limited and isolated low density hillside subdivisions that are themselves problematic for fire safety and municipal services, and open space. **Annexation of this area, not even included in the current sphere of influence, is an expansion of the city in a fully ‘disorderly’ manner.** We are compelled to point out that the beginning of the LAFCO statute quoted at the hearing begins with,

*“Among the purposes of the commission are discouraging urban sprawl, preserving open space....”* (Government Code Section 56301. Emphasis added)

Chaos and panic are the predictable results of evacuation failure in a fire emergency and *cannot* be the consequences of truly orderly patterns of growth. Harvest Hills is exactly the kind of project LAFCO was designed to prevent.

## **E. City financial issues worse than reported.**

In addition, although the staff addendum analysis notes that, as of FY 2020-2021, the City is meeting its financial commitments, a more recent staff report finding tells a different story going forward:

*WHEREAS, projections for budget deficits over at least the next 20 years reflect dramatic increases in expenditures and obligations that far exceed anticipated revenues resulting in a structural budget gap; (from 2022-15, staff report for item 10 on July 27, 2022 meeting.)*<sup>5</sup>

and

*WHEREAS, the City's ability to create and collect revenue has not been able to keep pace with the growing costs of providing municipal services and thereby threatens the City's ability to provide the needed services to ensure safe neighborhoods and quality services to support its residents;...<sup>6</sup>(from resolution 2022-99)*

Further, in recent meetings with local activists seeking to partner with the City on funding proposals such as CALFIRE Community Forestry and the California Strategic Growth Partnership, staff stated that the City was so understaffed that they were unable to implement the grant funding the City had already received, much less apply for any additional grants.

We request that this dire funding reality be updated and reflected in the Staff Addendum.

## **F. The required Safety Element Update has not yet been adopted; Housing Element in non-compliance.**

A relevant point was raised in the August 1, 2022 hearing by Mr. Bob Leiter and should also be considered in the staff analysis and recommendation. We do not believe Escondido can bring this project forward until the requirements of California Senate Bill 379 are met. . California Senate Bill 379 states that all local governments must update the Safety Elements of their General Plans no later than January 1, 2022, to, among other things, address the impacts of climate change on the frequency and severity of wildfires, along with its impacts on other types of safety and health hazards. The City of Escondido has not yet adopted this required update to the Safety Element.

Further, on August 2, 2022, CA Housing and Community Development sent the City of Escondido a notice that their Housing Element is still non-compliant. We believe this renders the Escondido General Plan in non-compliance with state law. All documents would need to be brought into compliance prior to advancing a project like Harvest Hills.

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<sup>5</sup> <https://mccmeetings.blob.core.usgovcloudapi.net/escondidca-pubu/MEET-Packet-98122d1ba6ab42078309e8345d234dd5.pdf>

<sup>6</sup> <https://mccmeetings.blob.core.usgovcloudapi.net/escondidca-pubu/MEET-Packet-98122d1ba6ab42078309e8345d234dd5.pdf>

In conclusion, we hope, by now, there is no need to go through the litany of fire disasters in our region. If permitted, Harvest Hills will be the next chapter in the deadly fire disasters of San Diego County. This issue alone is enough to require proponents follow the normal process of SIO and annexation review.

The problems with Harvest Hills are insurmountable and the project is dangerous. It should not be fast-tracked in any way and only considered as part of a comprehensive review.

Please contact us at [conservation@sierraclubcg.org](mailto:conservation@sierraclubcg.org) with any questions or for more information.

Thank you for your consideration,

*Dan Silver, Endangered Habitats League*

*Laura Hunter, Sierra Club North County Group*

*Peter Anderson, Sierra Club San Diego Chapter*

*NeySa Ely, San Pasqual Valley Preservation Alliance*

*Pamela Heatherington, Environmental Center of San Diego*

*Frank Landis, California Native Plant Society*

*Elizabeth Reid-Wainscoat, Center for Biological Diversity*

*Jim Peugh, San Diego Audubon Society*

*Madison Coleman, Climate Action Campaign*

*Tina Iki, Escondido Neighbors United*

*Livia Borak Beaudin, Coastal Environmental Rights Foundation*

*Van Collinsworth, Preserve Wild Santee*

*Robert Laudy, Friends of Goodan Ranch and Sycamore Canyon Open Space*

*Barbara Swanson, Buena Vista Audubon Society*

*Bill Tippets, Southwest Wetlands Interpretive Association*

*Diane Nygaard, Preserve Calavera*

*Jerry Harmon, Escondido Chamber of Citizens*

*Sandra Farrell, Friends of Hedionda Creek*

*Suzanne Hume, Clean Earth 4 Kids*

Atch:

- *Fire Risk Assessment of Harvest Hills, August 26, 2021. Rohde and Associates*
- *Harvest Hills Evacuation Plan Review by Neal Liddicoat<sup>7</sup> of Griffin Cove Transportation Consulting, February 17, 2022.*
- *Memorandum from Chief Rick Vogt in response to the Rohde Assessment listing nine major areas of concern. September 21, 2021*
- *Review of Fire Safety Engineering Issues Presentation, Summary slide, March 3, 2022, by Joseph B. Zicherman<sup>8</sup>, Ph.D., SFPE, Berkeley Engineering and Research*

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<sup>7</sup> Mr. Liddicoat is a licensed civil engineer with a particular expertise in the analysis of traffic operations at major event centers, at which large volumes of traffic arrive and depart in short periods of time such as event centers, amusement parks, and convention centers. As traffic operations principles in these analyses are similar to those that apply to wildfire evacuation planning, he is frequently retained to provide expert comments on the evacuation effects of large-scale residential and mixed-use projects,

<sup>8</sup> Dr. Zicherman is a leading scientist specializing in the fire performance of materials and systems. His analyses have been used to guide policy for the California Department of Forestry and Fire Protection.

**Sent:** Sunday, December 4, 2022 12:12 PM

**To:** Ngu, Dieu; Lockett, Tamaron ; Blom, Erica

**Subject:** [External] \*NEW SUBMISSION\* Commission eComments or Call-in Request Form

**Name**

Margot Lowe

**Agenda Item #**

6a

**Do you Support or Oppose the Agenda Item?**

Oppose

**Comments or Questions on the Agenda Item**

I oppose the creation of a Special Study area as part of the Escondido Sphere-of-Influence which would allow for early consideration, thus 'fast-tracking' for Harvest Hills. This project has unprecedented fire hazard risks and endangers on-site and surrounding communities. It threatens a globally significant endangered species facility and major economic driver for our region, the Safari Park. Please remove the special designation for Harvest Hills from the Escondido SOI.

**Sent:** Saturday, December 3, 2022 6:57 AM

**To:** Ngu, Dieu; Lockett, Tamaron ; Blom, Erica

**Subject:** [External] \*NEW SUBMISSION\* Commission eComments or Call-in Request Form

**Name**

Joanne Tenney

**Agenda Item #**

6a

**Do you Support or Oppose the Agenda Item?**

Oppose

**Comments or Questions on the Agenda Item**

Dear Commissioners, I oppose the creation of a Special Study area as part of the Escondido Sphere-of-Influence which would allow for early consideration, thus 'fast-tracking' for Harvest Hills. This project has unprecedented fire hazard risks and endangers on-site and surrounding communities. It threatens a globally significant endangered species facility and major economic driver for our region, the Safari Park. Please remove the special designation for Harvest Hills from the Escondido SOI.