

## DRAFT FINAL ENVIRONMENTAL IMPACT REPORT INFORMATION FOR THE READER

This document is the Final Environmental Impact Report (FEIR) for the proposed Harmony Grove Village South Project (“Project” or “Proposed Project”). The Draft EIR (DEIR) was circulated for public review from April 20, 2017 to June 20, 2017. A recirculated Revised DEIR (RDEIR) – consisting of an updated Table S-2, and the greenhouse gas (GHG) EIR section and supporting technical data – was circulated for public review from February 22, 2018 to April 9, 2018. All interested persons and organizations had an opportunity during these time periods to submit their written comments on the DEIR and RDEIR to the County of San Diego.

In addition to the RDEIR (further addressed below), and since circulation of the Project DEIR and associated technical reports, two topics have received additional technical review: transportation/traffic and biological resources. The additional review entailed some new analyses, and confirmed technical findings as disclosed in the circulated DEIR and technical reports. As appropriate, the findings are also addressed in responses to comments. The additional analyses are described below.

With regard to transportation/traffic, a number of confirmatory analyses were undertaken to update the traffic studies and in response to requests by commenters for additional information regarding the DEIR. These address: baseline traffic and freeway volume count validation; I-15 ramp trip assignment and freeway segment supplemental analysis; supplemental peak hour analysis for Project driveways; Synchro 10 and HCM 2010 methodology analysis; supplemental discussion of the approved Design Deviation south of the southernmost Project driveway onto County Club Drive; confirmation of the conservative disclosure of average daily traffic associated with the Project (the EIR traffic modeling discloses approximately 4,500 ADT, whereas the number based on proposed residential use types is 4,010 ADT); and correction to an element of an existing conditions figure as discussed below. Each of these is described and provided in the Final Traffic Impact Analysis (TIA), which is Appendix D to the EIR. The updates validate the findings of the Draft TIA, and confirm the analyses. No new information was identified that changed California Environmental Quality Act (CEQA) significance findings, and no changes were made to the DEIR on these topics. All the studies were completed in response to requests made by commenters and the responses to those comments provide the necessary information to answer the questions.

With regard to biological resources, following the 2016/2017 rainy season that ended a drought cycle and to take advantage of optimal environmental conditions, HELIX completed additional 2017 field visits to update botanical inventory and rare plants surveys in May and June 2017. These updated surveys supplemented and confirmed the previous vegetation and rare plants surveys addressed in the circulated April 2017 Biological Technical Report (BTR; EIR Appendix E), completed in April, August, and November 2014, and March and April 2017. During the May and June 2017 update rare plant surveys, HELIX also completed updated protocol-level surveys for the Hermes copper butterfly (*Lycaena hermes*).

These efforts are documented in the October 2017 Final BTR, summarizing new surveys, their dates, and qualified personnel; as well as updates to Appendices A and B of the report, which address plant and animal “Species Observed or Detected” tables. As noted, the updated survey results are consistent with those presented in the circulated document. No changes were identified

to less-than-significant, or significant, impact assessments based on these surveys. The focused changes resulted in confirmation of CEQA significance conclusions reached in the DEIR. The additional information provides clarification and additional documentation, but does not result in any significant new information requiring recirculation.

New technical efforts were not completed following recirculation of the RDEIR. The GHG EIR section and a Supplemental Letter to the April 2017 Greenhouse Gas Emissions Analysis (Appendix J to the EIR) conclusions were recirculated in early 2018. The recirculation augmented the previous analysis, and focused on clarification of Project Design Features (PDFs); including additional information related to Project on-site photovoltaic (PV; solar) panels as independently verified through third-party review; Project-related increases in CO<sub>2</sub> sequestration by approximately 100 percent over the existing conditions through the planting of new trees (a minimum of 2,045); and incorporation of information updating some regulatory data (including current status of the County Climate Action Plan [CAP]), as well as identification of mitigation measures requiring carbon off-sets. The recirculated subchapter is included in this FEIR as Subchapter 2.7, *Greenhouse Gas Emissions*, and is additionally discussed below.

The FEIR has been updated to incorporate relevant information based on these studies, as follows.

The EIR Summary has been updated to carry forward additional information from DEIR Chapter 4.0 relative to the discussion of alternatives, add summary discussions of alternatives GHG effects, and include the mitigation measures for GHGs circulated as part of the RDEIR, as well as delete references to reliance on renewables programs and commit instead to on-site satisfaction of Project electrical/energy needs through on-site installation of PV panels.

Table 1-2, *Project Design Features*, and Chapter 7.0, *List of Mitigation Measures and Project Design Features*, have been updated to incorporate re-worded/refined and additional Applicant commitments regarding GHG design features required as Project conditions. Some of these amendments apply also to other topical issues, such as Air Quality. Chapter 7.0 also has been updated with the GHG mitigation measures reviewed as part of the recirculated RDEIR.

Subchapter 2.2, *Transportation/Traffic*, contains updates to the existing status of the Harmony Grove Village circulation network, with additional improvements having been completed since the DEIR text was completed. It is also noted that traffic counts were updated in August 2017 to ensure that traffic loading addressed in Subchapter 2.2 is current. Overall, the 2017 traffic volumes were less than studied baseline volumes by an average of 23 (-23) percent. Regardless, the original projections of higher numbers have been retained for a conservative analysis. The subchapter also contains minor substantive additions primarily related to additional support of conclusions text, and Box 11 of the Subchapter 2.2 Figure 2.2-1, *Existing Conditions* schematic, has been revised to correctly depict the number of southbound lanes at the West Valley Parkway and W. 11<sup>th</sup> Street intersection in the City of Escondido (which matches Draft TIA/DEIR modeling that assumed the correct number of lanes). Similarly, Boxes 13 and 14 of EIR Figures 2.2-3, 2.2-4, 2.2-5 and 2.2-7 have been updated to reflect a corrected Project distribution of trips to the I-15 southbound ramps from 13 percent to the correct (and lower) 7 percent. Also, a footnote has also been added acknowledging a change in anticipated traffic loading onto Country Club Drive in cumulative conditions. The change did not result in identification of a new significant impact (a significant cumulative impact was already identified for the location), nor did it change the footprint extent

of the mitigation. It did result in an earlier “trigger” for mitigation implementation, as shown in Subchapte 2.2 and carried into Chapter 7.0.

Subchapter 2.3, *Biological Resources*, has been updated to include new survey dates for rare plants and Hermes Copper Butterfly habitat, as well as text regarding new plant and animal species observed during 2017 surveys.

Subchapter 2.5, *Noise*; and Subchapter 2.6, *Air Quality*, have minor substantive additions primarily related to additional support of impact conclusions text.

As noted above, Subchapter 2.7 was circulated for public review in early 2018. Having received public review of changes to the DEIR, the RDEIR circulated text is presented in clean form as part of this FEIR. Since public circulation, and in response to comments received on the RDEIR, new PDFs have been added (provision of two on-site electric vehicles and a location for future bus turn out to make the Project transit ready, as well as review for applicability of rain barrel installation), additional pdfs have been revised for clarity, and some some editorial changes have been made. A change in Mitigation Meaure GHG-2 for operational emissions also has been made; an element of the mitigation measure follow-up has been deleted. The circulated Subchapter 2.7 text allowed for potential reductions in the amount of credits purchased if improvements in technology resulted in fewer Project-related emissions that required mitigation (offset). The Applicant has committed to purchase of the full number of credits identified in the current EIR, with no opportunity to reduce their purchase obligation. Consistent with the circulated RDEIR, Project-related GHG emissions would be less than significant. Also consistent with the recirculated and updated GHG analysis text, associated changes have been made to the EIR Summary and Chapter 4.0, *Alternatives*, including addressing GHGs as a significant environmental issue based on inclusion in Subchapter 2.7 and provision of mitigation measures.

Section 3.1.1, *Energy*, and Section 3.1.5, *Land Use and Planning*, also have been updated to delete references to reliance on renewables programs and commit instead to satisfaction of of Project electrical/energy needs through on-site installation of PV panels on residences and the Center House. Section 3.1.1 also now incorporates energy use numbers publically circulated as part of the RDEIR. CEQA impacts remain less than significant.

Section 3.1.8, *Public Services*, has been updated relative to HGV Water Reclamation Facility references (e.g., completion) and the discussion of Project parcel treatment in the Rincon Municipal Water District Urban Water Management Plan has been clarified in response to a comment received.

A new chapter, Chapter 8.0, *Letters of Comment on the Draft and Revised Draft EIR and Responses*, includes each of the comment letters received and responses to them, as well as eight global responses (“topical” responses addressing issues that were questioned by a number of commenters), and related to the issues of County plan conformity, fire and evacuation issues, baseline conditions, and greenhouse gas-related issues.

In addition to the changes enumerated above, some other clarifying changes also were made, including minor changes to Figures 1-14a, 1-16a, 1-16b, 1-16f, 1-16g, and 1-17 to clarify items such as trail specifications and location of a new trail segment associated with a Project road

(Private Drive K), clarification of funding terminology for public services and amenities throughout relevant discussions, and additions to Chapter 5.0 references to include references cited in responses to comments. Non-editorial textual changes are provided in a “track changes” format, for ease of reader review.

All of these focused changes are clarifying in nature, do not constitute significant new information regarding the Project, and are consistent with CEQA significance conclusions reached in the circulated DEIR and RDEIR. No changes were identified to less-than-significant, or significant, impact assessments based on these data. The additional information provides clarification and additional documentation, but does not result in any significant new information requiring recirculation.