

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter I1</p> <p>From: Andy Laderman [mailto:aladerman@cox.net] Sent: Monday, June 19, 2017 10:34 AM To: Smith, Ashley Cc: Aghassi, Sarah; Horn, Bill; Ron-Roberts; Jacob, Dianne; Cox, Greg; Gaspar, Kristin; melanie.marshall@sduniontribune.com Subject: Harmony Grove Village South Draft Environmental Impact Report (PDS2015-GPA-15-002; PDS2015-SP-15-002;PDS2015-TM-5600; PDS2015-REZ-15-003; PDS2015-MUP-15-008; PDS2015-ER-15-08-006.)</p> <p>Dear Ms. Smith:</p> <p>T hank you for the opportunity to provide comments on the Harmony Grove Village South proposal being put forth by the Kovach Group and RCS Partners. I have lived in Eden Valley for over 30 years and am a proud resident of the united rural communities of Eden Valley, Harmony Grove and Elfin Forest. Over these 30 years I have seen numerous developments proposed for the remaining open spaces in our community. Nearly all of these projects proposed developments that would impact the area's community character and rural environment with no measurable benefit to the community and its residents. Indeed, without exception they all had significant environmental impacts that could not be mitigated. However this proposal, in common with the Valiano proposal, represents a level of impact I have never seen before - a clear and significant risk to the lives and safety of existing residents.</p> <p>The united rural communities of Eden Valley, Harmony Grove and Elfin Forest are in a designated Very High Risk Fire Area. Wildfires are a common occurrence in our community and at least once a decade we experience a major fire that destroys property, threatens or takes lives and requires mass evacuations of the area. In the 1990s we had the Harmony Grove Fire, in the 2000s the Witch Creek Fire, and most recently the Cocos fire in 2014. Mandatory evacuations were enforced in all 3 instances, generally with very little notice.</p> <p>The evacuations in past fires have been chaotic at times, stretching the limits of the capacity of our rural roads to handle the safe and timely evacuation of area residents as well as livestock. Country Club Drive from Kuana Loa to Auto Parkway has been at times the only evacuation route open as other roads in the area were closed by active fires. I can personally vouch for the volume of traffic, including many horse trailers that use this route to evacuate since my home is on this stretch of road. Evacuation congestion occurred even though this stretch of road has a Level of Service of A.</p> <p>Traffic studies have shown that if HGVS is approved along with Valiano and the build out of Harmony Grove Village, this stretch of Country Club Drive will have a Level of Service of F on a normal day. How is it possible to evacuate thousands more residents onto a 2 lane stretch of road that would already be at a Level of Service of F? The answer is that it can't be done. The existing road infrastructure is not appropriate for this density level, neither for traffic conditions nor in case of evacuation.</p> <p>Part of the HGVS solution is to adopt a "shelter in place" strategy for the construction of the development. This has 2 fatal flaws. Firstly, residents do not always follow this strategy. Our natural instinct is to get away from wildfires. The Crosby Estates in Rancho Santa Fe was built with a "shelter in place" strategy. However, during the 2007 Witch Creek Fire only a small percentage of the residents decided to actually shelter in place. The vast majority evacuated. Secondly, even if the residents of HGVS decide to shelter in place that does not help me or my neighbors evacuate onto a road that will already be at a level of service of F. The consequences of allowing this development to take place could be devastating when the next major wildfire occurs. Any elected representative or County official that approves this development must realize that they are putting the lives of County residents in danger and will have to live with that on their conscience when the inevitable occurs.</p>	<p>Response to Comment I1-1</p> <p>The County acknowledges the introductory comments pertaining to the commenter's background and residence within the area. The County does not agree that the Harmony Grove Village South (HGV South) Project, combined with the Valiano Project, would result in a significant risk to the lives and safety of existing residents. No significant and unavoidable impacts were identified within the EIR related to thresholds that would correlate with human safety. Both projects have undergone environmental review pursuant to CEQA on a project-specific basis, and both projects include the other as part of the cumulative condition. Based on assessment of their relative design features, as well as their required mitigation measures, no significant health and safety risks were identified within their respective DEIRs. Ultimately, the County's Board of Supervisors will determine, based on the environmental analysis and other factors, if the projects will be approved. Please see responses below to specific comments.</p> <p>Response to Comment I1-2</p> <p>The EIR states that the Project is within a Very High Fire Hazard Severity Zone (VHFHSZ) in EIR Section 3.1.3, <i>Hazards and Hazardous Materials</i>, Subsection 3.1.3.1, and additionally referenced in the Project's Fire Protection Plan (FPP) (DUDEK 2016). Based on its location in a VHFHSZ, the Project is required to provide for a level of planning, ignition-resistant construction materials, access, water availability, fuel modification, and construction methods that have been developed specifically to address and mitigate issues of developing within a VHFHSZ. The Project meets and exceeds these requirements by implementing fire and building codes and exceeding specific codes to provide additional fire protection based on the site, the development plan, and related constraints.</p> <p>Please also see Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I1-3</p> <p>Please see Table 2.2.6 of the EIR. There is only one segment of Country Club Drive with cumulative traffic loading. Also, lanes may be reassigned to carry</p>

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	<p>vehicles moving in a certain direction. Please also see Global Responses to Adequacy of Emergency Evacuation and Access.</p>

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<p style="text-align: center;">Comment Letter I1</p> <p>The Wildfire Emergency Plan included with the DEIR states that Country Club Drive is the only safe evacuation route, because Harmony Grove Road East and West could be compromised by wildfire. Yet the DEIR does not calculate how long it will take not only the development traffic, but existing residents to get to safety all the way to Auto Parkway. This information needs to be provided, and a simulation of evacuation needs to be modeled, to fully disclose the real risk to the current residents, since, as I stated earlier, I do not believe the evacuation can be carried out in a timely manner.</p> <p>Given that the Fire Protection Plan (appendix L) acknowledges that the project is proposed in a Very High Risk Fire Area and states "Fire history indicates wildfire has occurred on and in the vicinity of the project several times" I was shocked that fire officials have granted an exception to the Fire Code to waive the secondary access requirement. There are good reasons for the Fire Code requiring a secondary egress, especially in this Very High Fire Risk area. There should be zero tolerance for granting exceptions and exemptions to the California Fire Code in a Very High Risk Fire Area. The entire population at risk in case of wildfire includes all of Eden Valley, Harmony Grove, Elfin Forest, Harmony Grove Village and the City of Escondido community of Hidden Hills.</p> <p>The developer claims the project will help fund a financial shortfall for the HGV Fire Station. I would hate to think that this has influenced any fire official to grant the exemption. In granting this exception any fire official should also realize that they are putting the lives of County residents in danger and will also have to live with that on their conscience when the inevitable occurs.</p> <p>If you are in any doubt as to what can happen when a rural road becomes clogged with evacuating residents trying to escape a wildfire you need only turn to the recent tragedy in Portugal in which over 60 people died. Local police reported that at least 30 motorists died, trapped in their cars on the N-236 road which was clogged with evacuating residents from the rural community of Pedrógão Grande who were trying to reach the IC8 motorway to escape the fires. In addition, officials said they had found 17 bodies near the road, possibly those of people who had tried to escape on foot once they realized there was no way to continue driving. It is within the power of the Board of Supervisors to reject this disastrous proposal and stop a similar tragedy happening in the united rural communities of Eden Valley, Harmony Grove and Elfin Forest.</p> <p>Outside of the fire safety and evacuation dangers posed by this project, the environment will be impacted in many other ways including aesthetics, noise, traffic, greenhouse gases, etc. From a very personal perspective, my backyard and pool are within 50 feet of the traffic on Country Club Drive. Once Country Club Drive deteriorates to a Level of Service of F as would occur if this project and Valiano are approved, my backyard would become unusable. The ambient noise would exceed 65 decibels on a regular basis would be considered by the County of San Diego too high for outdoor recreational usage. The exhaust from all this traffic would reach an unhealthy level in my backyard. Mitigation for this impact on me and my neighbors needs to be a requirement if this ill-conceived and potentially deadly project is ever approved.</p> <p>Respectfully submitted, Andrew Laderman 2710 Surrey Lane, Escondido, CA 92029</p>	<p>Response to Comment I1-4 Please see Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I1-5 Precise specifics and simulation regarding timing of evacuation during fire events are wholly speculative and beyond the requirements of an EIR as they are wholly determined by the fire event, the direction the fire is moving, and directions issued by emergency fire personnel at the time. The Wildfire Risk Analysis prepared for the Project area by Rohde & Associates considered emergency evacuations and the perception that only one route was proposed for access/egress to the Project. The conclusion of that report's analysis was:</p> <p style="text-align: center;"><i>In contrast, the consultant staff and public safety officials who participated in the field tour of the site unanimously agreed that the site has 4 [sic] potential routes of egress during evacuation, two with strong viability. All participants expressed comfort that the proposed variance for the 800-foot single access road was acceptable.</i></p> <p>Please also see Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I1-6 As the comment states, the Project is located within a "Very High Risk Fire Area," referred to in the EIR as VHFHSZ; however, the FPP explains that the Proposed Project complies with all applicable fire code regulations, including but not limited to the California Fire Code, the Consolidated County Fire Code (CCR), County Fire Code, with one modification (allowed under the CCR to address conditions of a site), which was approved by the Fire Code Official. A request for a modification from Section 503.1.3 of the CCR with respect to dead-end road lengths was approved by the Fire Code Official because of the topographical, geological, and environmental conditions of the site make compliance with this standard infeasible. The FPP provides a detailed discussion of the dead-end road length requirements and how the Project meets the intent of the code through a layered and redundant fire protection and evacuation system.</p>

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	<p>Please also see Global Responses to Fire Hazards Impact Analysis.</p> <p>Response to Comment I1-7 Contrary to the supposition in the comment, the payment to the Harmony Grove Village (HGV) Fire Station is not being provided in exchange for an exemption from the Fire Code. As stated in Global Responses to Fire Hazards Impact Analysis, fire standards are expected to exceed Code requirements. Rather, the payment would support adequate fire services for the Project and the other communities in the new Fire Station’s response area. The contribution to the HGV Fire Station is a routine part of development fees, similar to those paid to support police services and schools.</p> <p>Response to Comment I1-8 The comment requests review of a recent fire and evacuation in Portugal but provides no comparison details. A comparison between Portugal and HGV South would not be valid as the factors and conditions related to each location are different or unknown. For example, the wildfire in Portugal had different roadway conditions, evacuation process, emergency management oversight, wildland fuels, number of persons and vehicles, distance to safe areas, and options for temporarily refuging on-site. The Portugal wildfire was burning in eucalyptus and pine forest, which would produce a much more aggressive fire than the coastal sage scrub and grasslands around the Project site and larger Harmony Grove Valley. Many other fire protection features built into the Project and measures routinely enacted by emergency personnel in San Diego County are not available and were not employed in the Portugal fire. Therefore, neither the FPP or EIR was revised to include this information.</p> <p>Response to Comment I1-9 Please see the above responses relative to fire safety and evacuation. The EIR details potential Project effects and impacts for each of the technical issues generally raised by the commenter. Aesthetics are addressed in EIR Subchapter 2.1, <i>Aesthetics</i>; noise is addressed in Subchapter 2.5, <i>Noise</i>; traffic is addressed in Subchapter 2.2, <i>Transportation/Traffic</i>; and greenhouse gas emissions are evaluated in Subchapter 2.7, <i>Greenhouse Gas Emissions</i>. Each of these topics are also cross-referenced within applicable portions of the Section 3.1.5, <i>Land</i></p>

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	<p><i>Use and Planning</i> discussions. Project Design Features relevant to each of these topics are presented in Table 1-2, <i>Project Design Features</i>, and both project features and mitigation measures, as applicable, are provided in Chapter 7.0, <i>List of Mitigation Measures and Design Features</i>. Each section appropriately addresses these topics.</p>