COMMENTS		RESPONSES
From: Mary Kubota [mailto:marykwiebel@gmail.com] Sent: Tuesday, June 20, 2017 8:39 AM To: Smith, Ashley Subject: Eden Valley		Response to Comment I10-1 The County acknowledges these introductory comments; however, they do not raise an issue concerning the environmental analysis or adequacy of the EIR. Please see the responses below to specific comments.
Ms. Ashley Smith Land Use & Environmental Planner Planning & Development Services 5510 Overland Avenue, Suite 310 San Diego, CA 92123 E-Mail: Ashley Smith@sdcounty.ca.gov Re: 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.)		Response to Comment 110-2 Although community character is mentioned, this comment focuses on fire evacuation. For that reason, the remainder of this response focuses on fire evacuation and secondary access. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. Response to Comment 110-3 Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.
Dear Ms. Smith: Thank 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 am a resident of the united rural communities of Eden Valley, Harmony Grove and Elfin Forest in unincorporated San Diego County, one of the last contiguous stretch of rural land and open space in the County within 15 minutes of the coast and with thousands of acres of open space. We are one of the oldest rural communities in the County, going back to the late 1800s with the establishment of the Harmony Grove Spiritualist Association. I've lived in Eden Valley for 8 years and Escondido for 40 years. I moved to this part of San Diego/Escondido due to its rural nature. It reminds me of the Escondido I grew up in and hope to continue to raise my family in this environment.	110-1	
FIRE EVACUATION ISSUES: I'm very concerned about this project because it risks my safety and destroys the community character of this wonderful little valley I live in. The fire evacuation issue is of utmost concern and the fact the Fire Protection Plan waives the crucial secondary access requirement is a very big deal for us. According to the DEIR, the project will help fund a shortfall that the County created when it approved the first development, HGV. We lived through Coco's Fire and evacuation was very compromised even without any new developments. We had many horse trailers clogging the roads, fire trucks, blocked traffic on both ends of our valley and it took a long time to evacuate. Harmony Grove Village had not been built yet. With HGV fully built out AND your misleadingly named HGV South, there will be another 1200 dwellings in the area which could bring 2400 more vehicles (all trying to get out). But what will NOT change are the roads in and out of our community and the proposed project. A two lane road is the only way in and out of this valley. And the County, in its infinite wisdom, has granted a variance to the secondary exit requirement. Even the DEIR's own fire studies show that Country Club is the ONLY safe way out during a fire. 1400 feet of road they propose improving prior to crossing the Escondido Creek is worthless when it comes to evacuation because what good is a wide road if it is only wider for 1400 feet. It bottlenecks right back to 2 lanes for the remainder of the several miles that it takes to get out of the fire trap we live in. Please re-analzye the fire risk, and require, at the very least, a secondary exit like all communities in Very High Fire Severity Zones. And please don't tell me that their un-official Shelter in Place "philosophy" will lessen traffic or reduce the fire risk. It will protect the existing residents, but we will be even more at risk. And studies show most people evacuate in the shelter-in-place communities anyways. Even though their houses might not all burn,	110-2	

COMMENTS

RESPONSES

Comment Letter I10

110-4

110-5

Please look at the tragedy this last weekend in Portugal where more than 60 people died trying to evacuate a wild fire. This is what can very well happen if the project goes through. You can read about it at this link (https://www.nytimes.com/2017/06/18/world/europe/portugal-pedrogao-grande-forest-fires.html) and the pictures tell the story. We hope this story does not get told in Harmony Grove where we have a serious fire once a decade that have cost property damage and even fatalities.

COMMUNITY CHARACTER: I think it is important to note that placing 453 multi-family units and condos in a rural community, abutting 1000s of acres of recreational and conservation open space is completely out of character. No matter what farm-related names you want to give these condos (granary?) placing a city block's worth of density into an historic, unique rural community that is the last of its kind anywhere in Southern California goes against everything the General Plan of San Diego, our community plan and really, common decency calls for. The traffic alone generated by this project will destroy our way of life since we all live on a narrow two lane country road. 4500 average daily trips takes it from Level A to Level F according to the DEIR. This and the many other impacts will forever change the nature of this community.

Please do not approve this project. Our lives depend on it and our way of life too.

Signed,

Mary Kubota Wiebel concerned resident

Response to Comment I10-4

The comment requests review of a recent fire and evacuation in Portugal. A comparison between Portugal and Harmony Grove Village South is not 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 oversite, 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 Fire Protection Plan (FPP) or EIR was revised to include this information.

Response to Comment I10-5

It is acknowledged that the Project exceeds the number of lots (approximately 220) allowed for the site under the 2011 General Plan land use designations. Even with this increased density, the Project is considered consistent with community character. Please see EIR Subchapter 2.1, *Aesthetics*, and the Global Responses to Project Consistency with General Plan Policy LU-1.4. Specific to traffic, and the effect of Project traffic on existing levels of service (LOS), the comment regarding the Project reducing levels of service along roadways from LOS A to LOS F is incorrect. Please see EIR Tables 2.2-6 and 2.2-7.

The Country Club Drive and Harmony Grove Road intersection would be improved as part of Project design (see the Project Vesting Tentative Map) to operate at LOS B. Even when all non-Project cumulative traffic is added in, identified impacts remain few. It is acknowledged that one existing LOS F segment (Harmony Grove Road between Kauana Loa Drive and Enterprise Street) would remain at LOS F. The County has a Traffic Impact Fee (TIF) Program to address cumulative impacts. As described in EIR Section 2.2.7:

...the segment is bound by two intersections, Harmony Grove Road/Kauana Loa Drive in the County and

COMMENTS	RESPONSES
	Harmony Grove Road/Enterprise Street in Escondido. The County intersection is located within the portion of Harmony Grove Road that is classified as a TIF-eligible facility. Therefore, the Project's TIF payment mitigates the shared intersection, which would improve operations on adjacent legs, both TIF and Non-TIF eligible. As such, cumulative improvements from TR-10 would apply to this impact, and implementation of mitigation measure TR-10 would be expected to reduce this cumulative impact to less than significant.
	Of all the other analyzed County intersections and roadways, the only remaining LOS F impact would be a related impact at the intersection of Harmony Grove Road and Kauana Loa Drive (where Existing plus Project plus Cumulative traffic would reduce LOS from D to F). As described above, the intersection would be improved to acceptable LOS via the TIF payment.
	Response to Comment 110-6 The County acknowledges the opposition to the Project. This comment does not raise specific issues regarding substantive environmental analysis within the EIR. The comment will be included as part of the administrative record and made available to the decision makers prior to a final decision on the Proposed Project.