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| <p style="text-align: center;">Comment Letter I11</p> <p>Ms. Smith,</p> <p>I greatly appreciate the opportunity to provide comments on the Harmony Grove Village South proposal. I have been a resident in Eden Valley for 14 years and unfortunately I have had to spend a good amount of time reviewing EIRs and developer's proposals for the open land in this valley. All of them have placed a higher value on their bottom line than on what they bring to our existing community and most provide nothing to mitigate the impact on the lives of those who already live here. They all attempt to get every variance possible and build as little infrastructure as possible despite its overall impact on the health and safety of current residents. It is my hope that the county places a higher value on the health and safety of the current and future residents in this valley than those who have written the proposal for Harmony Grove Village South.</p> <p>Harmony Grove Village South does not appear to be taking any actions to deal with the traffic impacts to the surrounding communities. In addition, there appears to be no concern that Country Club drive will be downgraded to a Level of Service F. This is essentially a non-functioning roadway due to volume of traffic. Their own fire study points out that Country Club Drive is the only viable escape route and yet they are not concerned about how residents will evacuate on a roadway that cannot handle its daily traffic, let alone emergency vehicles, horse trailers, and evacuees taking multiple vehicles and as many belongings as they can.</p> <p>I have a somewhat unique perspective when it comes to fires in this area as I am a former volunteer fire fighter for Elfin Forest Harmony Grove Fire Department, now part of Rancho Santa Fe Fire. As pointed out in the DEIR, the Harmony Grove Village South proposal is in the wildland urban interface. The project site as well as surrounding areas have had major fires where both property and life have been lost as recently as May 2014 when 11 fires broke out in areas surrounding the proposed project. Yet, the proposal ignores the fire dangers that exist and will continue to exist after build out. This project is particularly egregious as it completely neglects how residents in their project will evacuate. It seems the applicant is placing profit over health and safety of those who may purchase a home from them and over those who currently live in the communities surrounding their proposal.</p> <p>The applicant's proposal utilizes a single exit point. Every firefighter knows that you always plan two points of exit when fighting a fire to ensure your safety, it is part of your training and is drilled constantly. So why would a community be allowed to build in an extreme fire prone area that only has one exit? This scenario is a known problem when evacuating population and</p> | <p>Response to Comment I11-1</p> <p>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.</p> <p>Response to Comment I11-2</p> <p>The Project is located within the County's jurisdiction. The Project study area was selected based on the County of San Diego Traffic Report Format guidelines which indicate that local roads that receive 25 directional peak hour Project trips should be analyzed. This resulted in review of potential impacts in surrounding communities. Additionally, the study area was reviewed several times by the lead agency, the County of San Diego, as well as reviewed for locations outside of County jurisdictional boundaries, i.e., within the jurisdictions of the City of Escondido (a nearby community) and Caltrans. Both of those agencies reviewed the Project during public review.</p> <p>With respect to the statement regarding LOS F on Country Club Drive, it is noted that review of EIR Table 2.2-6 shows that in most instances the existing roadway segment level of service (LOS A, B, C, etc.) remains the same when Project traffic is added, with specifics where LOS F would occur along Country Club Drive addressed below. This would only occur when existing plus project plus cumulative traffic is added together.</p> <p>County Club Drive is abutted by a variety of developed uses and the roadway edge is variously plain dirt, or contains some shrubbery or trees, which varies widely by lot and type of abutting use.</p> <p>For purposes of information, within the City of Escondido, impacts were identified along a Country Club Drive segment (Impacts TR-1a and 1b), as well as at the intersections of Auto Park Way/Country Club Drive and Valley Parkway/Citracado (Impacts TR-8 and TR-9, respectively). For the Country Club Drive/Auto Park Way area, possible traffic mitigation was identified consisting of restriping and a signal change (M-TR-8); which, if approved by the City of Escondido, would lower impacts to less than significant levels and would allow the segment to operate more efficiently compared to pre-Project conditions. This would all occur within existing road bed and signal. For the</p> |

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| | <p>Valley Parkway/Citracado Parkway intersection (M-TR-9), a fair-share contribution would be a possible traffic mitigation for the impact.</p> <p>Specific to the small segment of Country Club Drive in the City’s jurisdiction, adding the Project to existing conditions resulted in LOS dropping from C to D. The LOS F identified in the comment is for that same segment and does not occur only as the result of the Project. When existing, Project and cumulative projects traffic is all added together, LOS E drops to LOS F.</p> <p>As detailed in Subchapter 2.2 of the EIR, potential mitigation was identified along Country Club Drive for less than 850 feet. Although design and final effects assessment would need to occur in concert with the City, it is noted that the great majority of this area is identified as “developed” for biological resources purposes. Approximately 440 linear feet on the north side (where a small slope is located between the road and the fenced parking areas associated with uses along Opper Street and Myers Avenue) also contain small retained areas of disturbed habitat, non-native grassland, and Diegan coastal sage scrub. There could be a potential effect on habitat associated with installation of improvements within those 440 linear feet; including a small amount of non-native grassland, and Diegan coastal sage scrub. Mitigation requirement approach and ratios are specified in Subchapter 2.3 of the EIR for both of these habitats (M-BI-1a and M-BI-2b, respectively) and are subject to the satisfaction of the wildlife resource agencies, as stated and the City.</p> <p>However, it is noted that the City of Escondido is a lead agency under CEQA for impacts within their jurisdiction, and it is Escondido, and not the County, that has responsibility for approval/assurance of implementation of those improvements. As such, the County cannot guarantee ultimate implementation or timing of City of Escondido-approved mitigation. Therefore, the mitigation measures identified above are not feasible. Thus, impacts within Escondido are identified as remaining significant and unavoidable.</p> <p>Within County jurisdiction, and also specific to the stated concern regarding Country Club Drive, it is noted that the Project identified impacts at the intersection of Country Club Drive and Harmony Grove Road (Impacts 2a and</p> |

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| | <p>2b). Mitigation was identified associated with the southern approach to the intersection, as well as payment into the County Transportation Impact Fee (TIF) Program (M-TR-2a and 2b, respectively). The Proposed Project also would add to cumulative impacts to one segment of County Club Drive in the County: from Hill Valley Drive to Kauana Loa Drive (Impact TR-3), where existing plus Project plus other cumulative traffic would result in LOS E dropping to LOS F. This is not a TIF-eligible facility. As such, mitigation (M-TR-3) is proposed on Country Club Drive to improve cumulative traffic flow by providing a dedicated lane for left-turning vehicles at Eden Valley Road. As stated in the EIR in Section 2.2.6, and in the <i>Traffic Impact Analysis</i> (TIA), this would provide a refuge lane for left-turning vehicles, thus improving the flow of northbound traffic and reducing the potential for vehicular conflict due to the slowing of northbound traffic. The intersection is disturbed and contains only non-native vegetation. No biological impacts would occur.</p> <p>For both jurisdictions, roadway areas were reviewed against cultural resources record search data (negative) and were surveyed for cultural resources in conjunction with Native American monitors (also negative results). Nonetheless, as required for all off-site improvements associated with the Project (M-CR-1 and 2), monitoring also would occur during ground disturbance. Potential for paleontological resources also was reviewed. The areas appear to be wholly lacking in potential resources, or to have low (minimal) potential for resources where undisturbed deposits are present. In these areas, immediately adjacent to graded and paved roadbed, the potential for impacts is considered less than significant. Pursuant to CEQA Guidelines Section 15126.4, potential impacts are less than significant.</p> <p>The comment also refers to the Wildland Fire Risk Analysis Report (Rohde & Associates 2016) and its conclusion that Country Club Drive is the only viable escape route. However, the report is presented out of context. In fact, the Rohde & Associates Report indicates that there are four potential evacuation routes available for ingress/egress north of Escondido Creek during evacuations. Please also see the Global Response to Adequacy of Emergency Evacuation and Access.</p> |

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| | <p>Response to Comment I11-3</p> <p>It is acknowledged that the Project is within a Very High Fire Hazard Severity Zone (VHFHSZ) and that fact is referenced in the Project's Fire Protection Plan (FPP; DUDEK 2016). Based on its location in a VHFHSZ, the Project is required to analyze and provide for a level of planning, ignition resistant construction, access, water availability, fuel modification, and construction materials and methods that have been developed specifically to address and mitigate issues of developing within a VHFHSZ. The Project meets and exceeds these requirements.</p> <p>Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Additionally, the fire scenario presented in the comment raises no new information that was not evaluated by the Project and presented within the fire technical reports. The worst-case conditions, based on realized weather and fuel conditions, were modeled, historical wildfires were compared, and design features were integrated into the Project based on that analysis. No revisions to the FEIR are warranted as a result of this response.</p> |

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| <p style="text-align: center;">Comment Letter I11</p> <p>has been proven to be deadly for those attempting to escape a natural disaster such a wildfire. But it is worse than what appears on paper. This single exit route is not merely a direct roadway to safety. This projects exit point is over a bridge that crosses the Escondido Creek. This creek runs east to west and has a heavy fuel load. As expressed in the DEIRs Wildfire Emergency Plan, the greatest danger comes from easterly winds (Santa-Anna winds). So any fire that starts east of this single exit point will be driven by easterly winds straight down the river bed which, just east of the Country Club bridge, also runs through a steep canyon. Such a fire is going to have an incredibly rapid rate of spread and it would likely overtake the Country Club bridge within minutes. This would block the single exit point from Harmony Grove Village South from being used as an evacuation route – even if residents could cross, it would likely have various fire apparatus on it or at the end of it as they work the fire. This will narrow the escape route or if kept open will hinder the fire fighting efforts. The topography of the area just east of the proposed Country Club bridge essentially sets up a scenario to create a natural blow torch. The bridge crossing could have a 200-foot clearance on either side (100 feet more per side than is required) and that would not stop such a windblown fire in the given topography. I also found no discussions about who would be responsible for maintaining a defensible space around the proposed bridge. During several wildfires I fought, it was not uncommon to have spot fires a quarter of a mile away or further in fairly open terrain. Just recently motorists on Interstate 15 lost vehicles when a wildfire crossed the eight lane freeway. We also witnessed this behavior during both the Cedar Fire in 2003 and the Witch Creek Fire in 2007 when flames jumped Interstate 15 near Rancho Bernardo and then burned up to the back side of Harmony Grove. So why then would one place more than 453 homes with 900 plus residents into what has the potential to be a death trap? It would seem that the profit gained by the applicant could never cover the loss of even a single life lost due to this major design flaw.</p> <p>This brings me to the plans for sheltering in place. The one thing that is not considered in the whole shelter in place planning is human nature. Most humans will attempt to escape when faced with a wall of flames that can have flame lengths in excess of 50 to 75 feet, with temperatures exceeding 1,000 degrees, spewing embers down on them like glowing rain drops, and sending out thick smoke as it rapidly moves towards them – the flight portion of the fight or flight human instinct is incredibly strong in such conditions.</p> <p>When a fire starts or burns toward a shelter in place community, many will stay as they have been told that it is safe to remain in their homes. In fact, they may not even get early evacuation notices; this according to the Rancho Santa Fe Fire chief at a recent community meeting. The concept of shelter in place, as we were told during the meeting, would be to have those residents stay in place to avoid adding to the traffic burden given the evacuation routes Level of Service rating. But, when the flames actually approach their properties they will question their safety, and for good reason – they would not be 100% safe. Unfortunately, these residents will try to evacuate after it is too late for them to safely do so. The general public does not understand fire behavior nor do most grasp the speed at which it can move. At this point they are panic stricken and desperate and will require further fire resources to evacuate safely. Sadly, it is this scenario where many have lost their lives and we have a very recent example of this from the fires in Portugal where more than 60 lost their lives attempting to evacuate. I have also personally witnessed this while working on the Witch Creek Fire. I worked mop up on a community that was a “shelter in place community” in Ramona. As we</p> | <p>Response to Comment I11-4</p> <p>Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>The comments regarding fires in Portugal and Ramona are acknowledged. These comments do not address the environmental analysis or adequacy of the EIR and therefore a response is not required.</p> |

I11-3



I11-4



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A substantial number of the residences would be in structures built to accommodate multiple dwellings.” This poses another serious potential for loss of life and property. Building condominium and multi-dwelling in a single structure in the wildland urban interface will equate to a larger loss of property and potentially life in a wildfire or in the least will require more resources to ensure the structure is protected during a wildfire event. Should one portion of such a structure catch fire, the fire will likely spread quickly as there are no spaces between the structures to allow fire fighters to cool the surrounding structures and there are not many wildland firefighters equipped to enter a burning structure – they are running structure protection (protecting structures from the outside). If a structure catches fire, most resources would be put towards protecting the structures that are not burning from the head of the fire of the structure that is burning. Sure the applicant will build these homes to withstand fire, will include sprinkler systems (which are designed to put out fires inside the structure if they have adequate water pressure to do so which is a wildfire scenario many don’t), and be built with fire retardant materials. But, I have yet to see a structure faced with a direct fire front not burn without significant fire fighter resources present. The code is not designed to ensure structures do not burn, it is designed to ensure occupants have adequate time to escape should the structure catch fire. However, in this scenario that will serve little to no purpose if there is not a means to exit the area.</p> <p>Fire issues aside, this proposal will destroy the existing surrounding rural communities with its traffic, road noise, added pollution trapped in the valley, and aesthetics that do not resemble the surrounding area. It is a poorly planned project that has one goal – make money for the applicant at any cost to the surrounding communities and the lives of those who may live there. It is my sincerest hope that the county carefully evaluates the dangers this proposal creates and the unique communities that could be lost.</p> <p>Sincerely, Bill Osborn 2952 Milpas Drive, Escondido, CA 92029</p> | <p>Response to Comment I11-5</p> <p>Fire and building codes specifically for homes and communities built in very high fire hazard areas (Chapter 7A of the California Building Code, as amended by the County of San Diego) have been developed to provide a high level of ignition resistance and are cognizant that fire-fighting resources may not be available at every structure. The structures in the Project have been designed to ignition resistance levels necessary for the worst-case fire scenario given the site’s fuels, terrain, and weather conditions.</p> <p>The perimeter fuel modification zones (FMZ) and site-wide landscaping restrictions, along with ongoing inspections and maintenance, separate flammable vegetation from the structures by at least 100 feet and/or reduce the fuel loads so that less heat is generated. Based on the inclusion of FMZs of at least 100 feet, and up to 150 feet, none of the site’s structures would be exposed to direct flame impingement. The structure setbacks and the multi-family dwellings that concentrate living units within a smaller footprint, result in less interface with wildlands and fewer resource needs for protection during a wildfire.</p> <p>Further, the multiple-unit structures require an enhanced fire sprinkler system which is a structure protection system. Fire behavior has been analyzed, compared to similar fire environments, and accepted by County Fire Authority. The Project has been designed with a layered system of protections and determined to include the necessary features to perform well during wildfires.</p> <p>Response to Comment I11-6</p> <p>This comment does not raise specific issues regarding the substantive environmental analysis conducted within the EIR; however, the County acknowledges the comment and opposition to the Project. 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.</p> |