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| **Ms. Ashley Smith**  
Land Use & Environmental Planner  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
E-Mail: Ashley.Smith2@sdcounty.ca.gov  
PDS2015-ER-15-006.)  
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 unincorporated 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 1900’s with the establishment of the Harmony Grove Spiritualist  
Association. I’ve lived in Harmony Grove – Cantride Community for over a year now and moved  
here because of the rural country feel large lots, and close knit community not to mention the safety  
for my family.  
FIRE EVACUATION ISSUES: I’m very concerned about this project because it risks my safety and  
destroy 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 weaves the crucial secondary access  
requirement is a very big deal for us. According to the CEIR, the project will help fund a shortfall that  
the County created when it approved the first development, HGV. We lived through Cocis Fire and  
evacuation was very compromised even without any new developments. We had many horse  
trailers clogging the roads, fire trucks, in/out 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  
maladvisedly 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 severe/molos that it takes to get out of the fire trap we  
live in. Please re-analyze 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  
“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, our older houses will. Except  
now, we won’t be able to get out due to the additional vehicular traffic. Please explain how your  
personal safety will not be many times worse if this project goes through.  

**Response to Comment I14-1**  
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.  

**Response to Comment I14-2**  
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  
Hazard Analysis and Adequacy of Emergency Evacuation and Access.  

**Response to Comment I14-3**  
Please see the Global Responses to Fire Hazards Impact Analysis and  
Adequacy of Emergency Evacuation and Access.
### Response to Comment I14-4

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 refugeing 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 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 I14-5

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 the Global Response 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 Harmony Grove Road/Enterprise Street in Escondido. The
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<td>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. <strong>Response to Comment I14-6</strong> The County acknowledges this comment and its opposition to the Project. This comment does not raise specific issues regarding the substantive environmental analysis conducted 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. No additional response is required.</td>
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