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 I16-2**

The Proposed Project would expand the Harmony Grove Village (HGV) village in a manner that is consistent with the community character of HGV and the surrounding areas. Please see the Global Response to Project Consistency with General Plan Policy LU-1.4.

**Response to Comment I16-3**

When the strict application of the requirements set forth in Section 503.1.3, is impracticable, the Fire Code Official may grant a modification from such requirements. A modification may be granted pursuant to Fire Code Section 96.1.104.8. (MODIFICATIONS) when the modification is in compliance with the intent and purpose of the Fire Code and such modification does not lessen health, life, and fire safety requirements. The Project is requesting a modification from Section 503.1.3 of the Consolidated County Fire Code (Fire Code) with respect to dead-end road lengths, because the topographical, geological, and environmental condition of the site, make compliance with this standard infeasible. The Fire Protection Plan (FPP) that describes the modification has been accepted by the Rancho Santa Fe Fire Protection District (RSFFPD), the Fire Authority Having Jurisdiction (FAHJ).

With respect to secondary access, the ability of the Project to provide a secondary access route was considered infeasible, as described in the FPP. (Secondary access is the typical mitigation for exceeding the dead-end road length, but is not required as stated in the comment.) Since secondary access was determined as not being feasible, the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors was evaluated. The Project developed an alternative approach for secondary access that meets the intent of the Fire Code through the implementation of a list of specifically developed measures and features as described in the FPP.
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<th>COMMENTS</th>
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<td>The commenter is correct in that secondary access route is a typical mitigation for exceeding the dead-end road length. However, it is not a requirement per se for development projects. The Project proposes meeting the intent of the Fire Code through a combination of measures that provide a system of fire safety above and beyond the Fire Code requirements. One of the most significant measures is construction of roads on site that include an additional travel lane that is within 800 feet of all Project structures. The additional travel lane provides additional capacity for evacuation and would occur throughout the Project, and would include Country Club Road from the southernmost Project entrance northward to Harmony Grove Road, including the bridge over Escondido Creek. This enhanced road capability would be supplemented by a complete system of fire protection that includes a redundant layering of measures designed to keep roadways open and passable, and reduce the possibility that wildfire threatens the Project. The primary Project access for Harmony Grove Village South (HGV South) would be via a widened Country Club Drive that provides three travel lanes. This includes a three-lane-wide bridge constructed over Escondido Creek that also includes separated horse and pedestrian pathways. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</td>
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<td>The commenter asserts that the EIR fails to account for cumulative emergency traffic from the residents of HGV with respect to County Club Drive being used for evacuation. In some fire emergencies, likely excluding shorter notice events, Harmony Grove Road would be available for evacuation. HGV residents would likely utilize Country Club Drive to the north/northeast into Escondido. During a wildfire evacuation, law enforcement and fire responders would evaluate conditions and fire spread and that information would inform continued evacuations. Law enforcement understands the importance of maintaining clear intersections to support evacuating residents. In an evacuation where HGV and HGV South were evacuating simultaneously, emergency managers (Office of Emergency Services, law enforcement, fire personnel, and others) would determine how to maintain traffic flow out of the area into Escondido, or, depending on conditions, to areas away from the wildfire or other threat. This may include directing traffic along Harmony Grove Road toward Rancho Santa Fe and the coastal communities. If a traffic</td>
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<td>surge or road blockage occurred, the decision makers would have a contingency to temporarily refuge residents within HGV and/or HGV South, including legacy residents that do not have the same level of protection.</td>
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| **Comment Letter I16**<sup>1</sup>  

nor in case of evacuation. The project is only proposing to improve 1,400 feet of Country Club Drive to the intersection with Harmony Grove Road, yet the project impact will result in unmitigated traffic and safety impacts on many more roads including Country Club Drive north of Harmony Grove Road, Kunita Lane, and Elfin Forest Road including all the way to San Elijo where evacuating traffic was stuck for almost 2 hours in the last emergency evacuation. The project risks compromising the evacuation of the entire communities of Harmony Grove, Eden Valley, Elfin Forest, Cielo and even San Elijo Hills by clogging evacuation routes. The DEIR needs to evaluate and disclose impacts on the entire regional road infrastructure.

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 project 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.

According to numerous studies including the latest from the National Park Service and the Department of Interior, human activity causes 90% of the fires. Introducing upwards of 453 houses and as many as 1,560 new people, in an area previously zoned for 25 under the General Plan greatly increases the overall fire risk to the surrounding residents. This is indisputable.

The project has a supposedly Shelter-in-Place “philosophy,” but what about the rest of us who will be trapped on dead end roads with no secondary egress behind 1,500 additional cars? Will the developer make our homes shelter-in-place too? Many of our homes were built before 1980, mine is from 1950. And more than 20 houses burned only 3 years ago in the same exact area they are proposing 453 homes. The EIR should evaluate proper mitigation measures such as providing the same structure hardening mitigation measures as inside the project to all the existing structures their project will endanger; this could include installing fire sprinklers, replacing roofs, installing double glazed windows, cement board siding and appropriate roof vents, for example, to all those homes trapped behind the project entrance. The applicant should bear the cost of these hardening mitigation measures since they will be causing entrapment of current residents.

The granting of an exception to the Fire Code to waive secondary access requirement worries me the most. There are good reasons for the Fire Code requiring a secondary egress, especially in this Very High Fire Risk area.

It is also extremely disturbing to read in the DEIR that the developer is claiming the project will help fund a financial shortfall for the HGO Fire Station, especially in conjunction with asking the County to grant exceptions to the Fire Code. This smells of conflict of interest.

BROKEN PROMISES: our community worked cooperatively and in good faith with County staff during the OCP update process to maintain our community’s rural character, as denoted by the compromise on Harmony Grove Village, based on the agreement that this more than doubling of our density would be our fair share of population growth; the rest of our community was downzoned to reflect that agreement. Now, only 5 years after the General Plan was approved, developers are seeking to set aside this negotiation and pile another 453 houses into our community after we had already agreed to 742 in HGO. There are numerous references to this negotiation and compromise throughout county planning documents, video from HOG meetings and there are many folks, including former County staff, current and former board of supervisors that would attest to it.

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1. **Response to Comment I16-4**

The County acknowledges these comments; however, they do not raise an issue concerning the substantive environmental analysis within the EIR. Please also see the Global Response to Project Consistency with General Plan Policy LU-1.4.
Response to Comment I16-5

The EIR did not identify significant impacts related to public health, safety, and welfare. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access, regarding fire safety and evacuation issues. Comments related to “public interest” concerning the Proposed Project and the sales of the existing HGV development do not raise environmental issues and therefore no further response is warranted.

Response to Comment I16-6

The southernmost portion of the Project site is bordered by Del Dios Highlands Preserve, to the east and west are equestrian (and non-equestrian) residential uses, the Harmony Grove Spiritualist Society is also located to the west, and the HGV residential development site is located to the north. None of the Project site is currently within “protected open space.” Please see the Global Response to Project Consistency with General Plan Policy LU-1.4.

Country Club Drive and Harmony Grove Road currently operate at an acceptable level of service (LOS) under County guidelines, LOS D. As concluded in Subchapter 2.2, Traffic/Transportation, of EIR, the Project would not result in significant, unmitigated impacts to Country Club Drive or Harmony Grove Road. As part of the Project design and mitigation, Country Club Drive would be expanded to three lanes, more consistent with the portion of Country Club Drive north of Harmony Grove Road and with the portion of Harmony Grove Road trending west. Please refer to Subchapter 2.2, Traffic/Transportation, Section 2.2.7, Conclusion, of the EIR which presents the rationales for the conclusions of impact levels resulting after implementation of the Project and the proposed mitigation measures.

Response to Comment I16-7

Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. The analysis of health and safety in case of wildfire has been adequately addressed and recirculation is not required. The contribution to the HGV Fire Station is a routine part of development fees, similar to those paid to support police services and schools. The payment would support adequate fire services for the Project (and, it is assumed, surrounding neighbors).
Response to Comment I16-8

The County acknowledges the comment, and it 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. This comment does not address the environmental analysis or the adequacy of the EIR, and no additional response is required.