

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter 17</p> <hr/> <p>From: Molenaar, Amy [mailto:Amy.Molenaar@ironmountain.com] Sent: Monday, June 19, 2017 6:19 PM To: Smith, Ashley; Aghassi, Sarah; Horn, Bill; Ron-Roberts; Jacob, Dianne; Cox, Greg; Gaspar, Kristin; marsenault@realcapitalsolutions.com; efhtc@gmail.com Subject: Molenaar DEIR Comments RE: Harmony Grove Village South Draft EIR (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>Thank you for the opportunity to provide comments on the Harmony Grove South proposal being put forth by the Kovach Group and RCS Partners. I am a resident of Harmony Grove – the portion of Harmony Grove that is surrounded by open space and that was rezoned in 2011 to one home per 20 acres. Although many people do not like it when their property and surrounding areas are rezoned and downzoned, I realized this designation was in the best interest of my community, public safety and the ecosystem. I realized that to allow for more density and development in this ecologically-diverse, high-risk fire area is a very, very bad idea. And, I understood why the County put a well-thought-out plan in place to protect our resources and the community. After all, in our valley we have narrow, two-laned roads; we are highly, and sometimes solely, dependent upon ground water for beneficial uses; we are surrounded by coastal sage and large riparian areas of protected open space; we border a creek – my house being just 500 feet from it – that empties into a suffering San Elijo Lagoon ... and eventually to the Pacific Ocean. Today, and considering the aforementioned, I am trying to understand how the County could justify an upzone for Harmony Grove Village South – considering it is <i>less than</i> one mile from my home and shares all of the same characteristics of my land with the exception that, unfortunately, the people in HGVS will not be solely dependent on groundwater and therefore may not care about what chemicals and detergents and pesticides they dump in their yards or down one of the natural “existing drainage systems.” The DEIR notes that the project site is not located within the areal extent of any known, mapped regional groundwater basins -- but there are many people solely dependent on groundwater in this valley and I am concerned that this cumulative development (on top of HG Village, which was enough) and the continuing plans for more development and more GPAs will certainly have an effect on the groundwater that our crops and homes depend upon. I would like to see further studies on water quality, because what I read in the DEIR is short-sighted and seems to speak of pre-development, and not post-development, conditions.</p> <div style="text-align: right; margin-right: 50px;"> <p>17-1</p> <p>17-2</p> </div>	<p>Response to Comment I7-1</p> <p>The comments regarding the General Plan/Community Plan update process that was completed in 2011 and existing conditions of the Harmony Grove Village (HGV) area are noted. Please see the Global Response to General Plan/Community Plan Amendments CEQA Impact Analysis.</p> <p>Response to Comment I7-2</p> <p>Regarding potential impacts to water quality, including groundwater water quality, please see FEIR Section 3.1.4, <i>Hydrology/Water Quality</i>. Regional ordinances control water quality and require conformance to standards. The Project will be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) and Monitoring Program during the final engineering phase of the Project that focuses on the construction period.</p> <p>The topography of the site and the proximity to Escondido Creek are evaluated throughout the EIR. The level of information provided in the EIR is appropriate and sufficient to understand the kinds of issues that would arise during construction of the Project, and also the routine nature of these issues, including control of runoff (both volumes and quality) and erosion control. Project requirements include the Construction Site Monitoring Plan (CSMP), a Risk Assessment to determine the Project’s Risk Level (1, 2, or 3), and appropriate Risk Level Requirements as outlined in the Construction General Permit and the SWPPP. The SWPPP and CSMP would be prepared by a qualified SWPPP preparer, with this plan to be located on-site at all times during construction.</p> <p>The types of erosion and sediment controls applicable to the Project are enumerated as requirements for containment of construction debris distance from storm drain inlets/water courses and disposal so as not to allow runoff into surrounding waters. Prior to and after storm events, BMP function and efficiency would be checked by construction contractor and implementation monitors.</p>

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	<p>Sampling/analysis, monitoring/reporting and post-construction management programs would be implemented per NPDES and/or County requirements, along with additional BMPs as necessary to ensure adequate erosion and sediment control. All of these, as well as numerous other relevant BMPs, are detailed in EIR Table 1-2 and Chapter 7.</p> <p>Their discussion and required implementation not only demonstrate an understanding of potential adverse impacts without their use, but also ensure that proper actions would be taken to render impacts less than significant. Cumulative issues are addressed within the section, and again, are subject to ordinance.</p> <p>Specific to groundwater, as stated in the EIR:</p> <p><i>Domestic water supplies for the Proposed Project would be obtained from the Rincon MWD, with no groundwater use proposed for domestic or other purposes. As previously noted, implementation of the Proposed Project would result in the addition of approximately 38 acres of impervious surfaces in the form of pavement and structures. As a result, approximately 73 acres (or approximately 66 percent) of the site would remain pervious, including areas such as open space, landscaping, and unlined drainage facilities (refer to Figures 1-6a and 1-13). Based on these conditions, as well as the fact that virtually all areas proposed for development currently encompass Hydrologic Group C or D soils (with low or very low water transmission rates; PDC 2017b), infiltration of surface flows and related recharge capacity within the Project site are anticipated to exhibit only a relatively minor reduction compared to existing conditions.</i></p> <p><i>Project construction may also require localized extraction/disposal of shallow groundwater to accommodate activities such as grading and excavation. Because shallow groundwater is limited to the northernmost portion of the site, however (as described above in Section 3.1.4.1), construction-related dewatering</i></p>

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	<p><i>is anticipated to be minor in extent and short-term in duration (refer also to the related discussion of potential groundwater extraction and associated water quality requirements below in this section under Guideline Nos. 8 through 11).</i></p> <p><i>Based on the above considerations, Project-related impacts associated with drawdown of local groundwater aquifers or reductions in local groundwater well yields would be less than significant (EIR pg. 3.1.4-19).</i></p> <p>Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p>

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<p style="text-align: right;">Comment Letter 17</p> <p>I am also concerned that the County is comfortable waiving the 800 foot minimum dead end road and secondary access requirements. This basically means that all traffic will all flow through a single egress – which puts lives in danger ... as most people want to get away from wildfires. This single route to flee will lead to highly congested roads. I have read through the DEIR, and there does not appear to be any realistic mitigation measures for the traffic impacts and, with the County seemingly eager to waive safety issues, it seems the only solution is to <i>mandate</i> that any new residents added by way of developer-influenced GPAs either shelter in place or obtain the insurance and skills needed to fight fires from their rooftops – this would be difficult to “sell” but it would at least be some form of planning, and would reduce traffic on the roads for those of us who moved in before all of this new density and upzoning was considered. I have a difficult time believing that anyone truly wants to “shelter in place,” so it is extremely important to ensure community safety in an area that has seen multiple fires and a “neighborhood” that burned down in 2014. As a start, a comprehensive review of evacuation timelines via simulation needs to be undertaken – and if HGVS is allowed to move forward as planned, and health and welfare measures will be waived, then all of the residents in this valley will certainly need to be trained in fire-fighting measures ...as some of us just not make it out without these skills (would the County or developer be open to subsidizing this training?)</p> <p>Very concerning to me is this: Harmony Grove Village South and all of its surface water will eventually flow into the Escondido Creek -- which is already having degradation issues from upstream development and flooding that is ripping the willows and coyote brush (the stabilizers) from the banks as well as toppling the oaks and sycamores.</p> <p>Additional hardscape will channel more water downstream. I do not see any considerations in the DEIR regarding the effect of the project’s hardscaping/concrete installment on water volumes -- although I do see that all the water from the project area will be filtered into the creek through “existing drainage systems.” Currently the space is open and is not developed, and thus the water soaks into the earth ... but what about post-development? Also, all of the chemicals that accompany a “neighborhood” (bug spray, weed killers, soap, oils, detergents) will eventually be sent down the creek to San Elijo Lagoon -- which is a highly compromised body of water. Much of the data presented in the DEIR regarding water quality seems to focus on <i>pre-development</i> status with no attention paid to the cumulative effects of all future planned development and the use of the land post development. I would like to better understand what the scenario looks like post development, under the circumstances of regular and expected “land use” in a high density housing community.</p> <p>I am also very concerned about the “sewer/package plant.” I do not see any information regarding it and the risk for pollution – including odiferous air pollution and groundwater and creek pollution. It is not clear as to whether or not this component of the project will be placed in the Flood Zone adjacent to Escondido Creek. I am disturbed by the fact that so many “sewage systems/package plants, etc.” can exist in a 1-mile radius ... all within a few hundred feet of a creek that is already compromised and has seen pollution from HAARF overflows. And, the visual aspect of these sewage systems and the stench is really offensive. Harmony Grove Village, which currently pumps their sewage by truck a few times a day, smells ... like shit. What happens when another one is added a few miles up the road (cumulative effect) and if the water in the creek is polluted, how do we determine who is doing the polluting: Is it HAARF, is it HGV, is it HGVS or is it ... Valiano? I would like to see more information in the DEIR regarding this. This just seems really wrong and I would expect there to be some CEQA guidelines around “package plant” densities in a one mile radius (?)</p>	<p>Response to Comment 17-3</p> <p>Implementation of the Project would require conformance with a number of regulatory requirements. Based on conformance with these requirements, including design measures described in Chapter 7, <i>List of Mitigation Measures and Project Design Features</i>, of the EIR, all identified Project-level hydrology and water quality impacts would be avoided or reduced to less than significant. As discussed in Section 3.1.4, <i>Hydrology/Water Quality</i>, Subsection 3.1.4.3 of the FEIR, the cumulative hydrology/water quality impacts would be less than significant. A <i>CEQA Preliminary Hydrology/Drainage Study</i>, Appendix M1, <i>Hydromodification Screening Analysis</i>, Appendix M2, <i>Preliminary Hydromodification Management Study</i>, Appendix M3, <i>Hydraulic (Floodplain) Analysis for HGV South</i>, Appendix M4, and <i>Priority Development Project Storm Water Quality Management Plan (PDP SWQMP)</i>, Appendix N, of the EIR, have been prepared in conformance with the County of San Diego requirements.</p> <p>Response to Comment 17-4</p> <p>The sewage/package plant would be a water reclamation plant to treat the wastewater to a level acceptable for reuse in the Project and the surrounding area. All wastewater treated at this plant would be reused. This would reduce the Project’s need for imported water. The water reclamation plant will be required to obtain permits to ensure that it is protective of groundwater, Escondido Creek, and the atmosphere. The water reclamation plant will not be within the flood zone and regulations require it to be located outside of the 100-year flood plain. When the Project is placed in a wastewater agency, the agency will make the final decision on construction of a new treatment plant or expansion of an existing plant. The Project is being evaluated for an independent wastewater treatment plant to ensure the Project can meet its wastewater treatment needs independently from existing facilities.</p>

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<p style="text-align: right;">Comment Letter 17</p> <p>Lastly, multi-family, high-density housing does not align to the character of our neighborhood and will destroy not only the promise of our valley and its peaceful, quiet and rural feeling, but it will also have negative, destructive, effects on our parks and open spaces. I have seen how the increase in population from San Elijo Hills and Harmony Grove Village has affected Elfin Forest Preserve. Although most people respect this resource, it is the increase in visitors that is causing issue – I have seen spraypaint “tagging” on the rocks, significant off-trail use, parking lot overflow – there used to be maybe 20 cars on the weekend and now there are hundreds; sometimes parked up and down Harmony Grove Road. Harmony Grove Village South is adjacent to the Del Dios Highlands Preserve, which today is a quiet park and one that is not overburdened with visitors. If HGVS is developed this park will also be overcrowded, which leads to a decline in flora and fauna. HGVS does not belong in our valley – it would be better suited for an area where there is better infrastructure (roads, sewer, etc.) and less sensitive species.</p> <p>This DEIR needs to be recirculated to fully disclose the true impacts to health and safety in case of wildfire and water quality -- the analysis of which is woefully inadequate. The County should also preemptively refuse to take any monies for the HGV fire station from developers unless they conform to the General Plan, to prevent even the appearance of quid pro quo in the granting of exemptions to the Fire Code in a Very High Fire risk Area. I would also appreciate some more comprehensive information regarding post-development effects on water quality.</p> <p>Thank you,</p> <p>Amy Molenaar 9115 Harmony Grove Road Escondido, CA 92029</p>	<p>Response to Comment I7-5 The County acknowledges the comment and opposition to the Project. As discussed in FEIR Section 3.1.9, <i>Recreation</i>, both direct and cumulative impacts to recreation facilities would be less than significant. Otherwise, the comment does not raise any specific issues regarding the environmental analysis or adequacy of the EIR.</p> <p>Response to Comment I7-6 The County disagrees that recirculation of the EIR is required. Please refer to Response to Comment I7-2, above, regarding these issues.</p> <p>Response to Comment I7-7 The County acknowledges the comment; however, the comment does not raise specific issues regarding the environmental analysis or adequacy of the EIR. Please refer to Response to Comment I7-2, above, regarding water quality.</p>