

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter O1</p> <p style="text-align: center;">San Dieguito Planning Group P.O. Box 2789, Rancho Santa Fe, CA, 92067</p> <p>June 19, 2017</p> <p>Ashley Smith, Land Use Environmental Planner Planning & Development Services County of San Diego 5510 Overland Avenue, Suite 110 San Diego, CA 92123</p> <p>RE: Response to DEIR for the Harmony Grove Village South Project – Log No. PDS2015-ER-15-08-006, SCH No. 2015081071, PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS-REZ-15-003, PDS2015-TM-5600; PDS2015-MUP-15-00, and a draft Habitat Loss Permit (PDSXXXX-HLP-XXX)</p> <p>Dear Ms. Smith,</p> <p>The San Dieguito Planning Group appreciates the opportunity to comment on the Draft Environmental Impact Report for the project referenced above (Project).</p> <p>Project Description. The Project description refers to Project location as a “fourth quadrant of Harmony Grove Village”: this description prematurely assumes that the Project will be deemed to be a bona fide expansion of the original Harmony Grove Village (HGV), and therefore can be misleading to readers. Please revise this wording. This concern about willful confusion of the public carries to the very name of the Project, which is clearly meant to associate it with an existing approved project that has a different ownership and entitlement status.</p> <p>In the Summary, the Project is said to “complete the Village” in conformance with the Community Development Model (CDM) featured in the County General Plan (GP). However, HGV was designed by the County through a series of visioning workshops with the community as a complete village with a perimeter of large lot horse-keeping homes <i>precisely to limit</i> further urbanization by implementing the inherent density gradation of the CDM. The County staff proposed this village development model and withdrew their original proposal of 7.3 DUs per acre throughout this valley in 2002 during the GP 2020 process [see Community Working Copy Map – September 2002, page 5 of <i>Chaparral</i> http://efhgtc.org/chaparral%20archives/January03Chaparral.pdf]. County staff explained at three County-sponsored visioning workshops that this pattern of a higher density urban core allowed the peripheral low density rural homes to remain while accommodating considerable population growth. The CDM preserves the urban-rural balance so critical to maintaining the community character.</p> <p>To realize this goal of preserving the local rural community, the County approved a Specific Plan in 2007 with as condition of approval a restriction on the HGV Water Reclamation Facility to prevent any future expansion, and limited the sewer district to within the County-established Village Limit Line, beyond which only estate residences on septic systems were allowed. To further clarify this objective, the County approved the HG CP on August 3rd, 2011, which states on page 19: “<i>The Harmony Grove</i></p> <p style="text-align: center;">1</p>	<p>Response to Comment O1-1</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 O1-2</p> <p>It is not the intention of the EIR to mislead or otherwise misinform the readers or interested parties. The name of the Project describes a geographic and neighborhood location. The name of the Project was chosen because it is proposed as an extension of the village. The same design would not have been proposed if the Project parcels were not contiguous to the existing village. The presence of Harmony Grove Village (HGV), including the completed parks and planned Equestrian Ranch across the street from HGV South, provides physical context.</p> <p>The comments on the history of HGV entitlement are noted, but not material to the Project’s proposal to amend the General Plan.</p> <p>The General Plan on page 2-7 recognizes the need to accommodate future growth by planning and facilitating housing in existing and planned villages. The General Plan on page 1-15 states that it is intended to be a dynamic document and there are numerous policies in the General Plan that accommodate planning for future growth, such as M-2.1 (require development projects to provide road improvements), M-3.1 (require development to dedicate right-of-way), S-3.1 (require development to be located to provide adequate defensibility) and COS-2.2 (requiring development to be sited in least biologically sensitive areas). In addition, General Plan Policy LU-1.4 permits an expansion of existing or planned villages that are consistent with the Community Development Model (CDM) and meet the requirements set forth therein. Therefore, the language in the General Plan clearly allows for future amendments to the Land Use Map and Regional Categories Map. Please refer to Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis for a thorough discussion on related topics. The County agrees that the CDM is a tool to preserve the urban-rural balance and community character.</p>

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<p style="text-align: right;">Comment Letter O1</p> <p><i>community, working with County staff, designed a Village Development Pattern Model as represented in the General Plan Land Use Map. There still exist many large undeveloped parcels of land within Harmony Grove outside the footprint of the approved Village. Development of these parcels with an urban, clustered or suburban design would threaten the continued existence of the rural residential and equestrian character of Harmony Grove.” Because the Project claims to be an expansion of HGV, the history of HGV should be included in the background information for this project to allow the public and the decision makers to evaluate its claim to be a part.</i></p> <p style="text-align: right;">O1-3</p> <p>We are disappointed that a number of requests made by this group in the NOP comment letters have been ignored. Section 1.2.1 Existing Conditions, continues to fail to describe the historic, over 120-year-old Harmony Grove rural community and its long-standing representative citizen’s group, the Elfin Forest Harmony Grove Town Council. Again, we ask that this important background information be added so that the reader can properly interpret the impacts of the Project within its historical and municipal context. We also asked for a discussion of the likely consequences of a breach of trust because the overall planning scheme proposed by the County for the valley is disregarded and nullified by the Project. Approval of this GPA, given the County’s integral and leading role in the planning of the Harmony Grove Village area, will have repercussions on community faith in their planning documents, not just for this area, but for every planning area in the County. From an overall planning perspective, this backfill clustered housing Project could result in checkerboard development that contravenes the adopted goals and maps of the General Plan. The impact of this possibility should be identified, discussed, and adequately mitigated.</p> <p style="text-align: right;">O1-4</p> <p>Page 1-36: The DEIR states of the Project that “It supports planning agencies goals to reduce “leap frog” development, urban sprawl and increased traffic congestion as residents of far-flung communities compete for access to centralized resources.” In fact this Project <u>introduces</u> leap frog development, as it provides high-density multifamily units located beyond the lowest density Hillside Farmhouses in HGV, beyond the Village Limit Line, and outside of established water and sewer service boundaries. It creates urban sprawl by introducing 453 units where only 25 were allowed under the previous General Plan, and <u>increases</u> traffic congestion on the surrounding rural two-lane roads. Please delete this misleading statement or provide evidence-based support for retaining it.</p> <p style="text-align: right;">O1-5</p> <p>Land Use and Planning</p> <p>Page 3.1.6-14. Policy LU-6.4 requires (among other things) protection of agricultural operations for residential subdivision projects. The EIR concludes that there are no existing agricultural operations on, or adjacent to, the Project site, and therefore, the Project would not result in indirect conversion of agricultural resources and no impacts would occur. However, family farms, which can be a significant source of agricultural resources, already exist in the HG community and are encouraged by the CP. Current zoning would allow for such land uses on the Project site, but these land uses are not allowed by the Project. This reduction in land use diversity creates a significant impact that should be analyzed and mitigated.</p> <p style="text-align: right;">O1-6</p> <p style="text-align: right;">O1-7</p> <p style="text-align: center;">2</p>	<p>Response to Comment O1-3</p> <p>Comments noted. The history of HGV is not necessary to an understanding of the existing and planned conditions within the Harmony Grove Valley. The Project is amending the General Plan by expanding an existing Village and meets the criteria of Policy LU-1.4. Please refer to Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis for a thorough discussion on related topics. Please also note that review was specifically undertaken to evaluate the potential for additional parcels with development potential. As noted in EIR Chapter 4.0, <i>Alternatives</i>, on page 4-4, no other similarly sized property is available in the community. Additionally, as stated in the EIR:</p> <p style="text-align: center;"><i>...most of the land west of the Project is already developed or lies within an approved development plan, with the exception of a small section of Semi-Rural (4) to the west of the Project, and south of Country Club Drive. Scattered within that area, there are seven unbuilt parcels, all in individual ownerships, that range in size from 0.81 acre to 3.46 acres. At this time, there are no known plans for development in this area. Parcels to the east are primarily developed as privately owned estate residential, to the west with large lot residential, and to the south (and east of the southern part of the Project site), there is existing open space preserves... (EIR pgs. 1-36 to 1-37).</i></p> <p>Response to Comment O1-4</p> <p>This comment generally contends that Notice of Preparation (NOP) comments provided by the commenter and others were not addressed. However, the DEIR adequately analyzes potential environmental impacts and relevant NOP comments in Chapters 2.0 through 4.0 of the EIR. Please refer to Response to Comment O1-3 regarding area history relative to HGV. Subchapter 1.4, <i>Environmental Setting</i>, of the EIR specifically addresses the historic nature of the Harmony Grove Spiritualist Association. Relevant discussion of the site is also provided in the Project Cultural Resources Technical Report (Appendix F to the EIR) with summary conclusions provided in Subchapter 2.4, <i>Cultural Resources and Tribal Cultural Resources</i>.</p>

	<p>Response to Comment O1-5</p> <p>The County acknowledges this comment; however, it does not address environmental evaluations or the adequacy of the EIR and therefore does not require a response. The EIR, pursuant to CEQA, is required to analyze and disclose physical impacts on the environment due to the Proposed Project. In reference to the comments regarding the perceived “breach of trust” issues and “checkerboard development” please see Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis. This comment will be made a part of the administrative record and will be available to the decision makers during consideration of the Project for approval or denial.</p> <p>Response to Comment O1-6</p> <p>The County respectfully disagrees that the Project would result in leapfrog development or urban sprawl. The Project does not meet the definition of leapfrog development under Policy LU-1.2 because the Project proposes to be designated as a “village” by expanding the existing or planned village of HGV pursuant to the criteria outlined in policy LU-1.4. Therefore, the Project’s village densities will not be located away from an established village. Rather, the Project will expand the existing village of HGV consistent with the CDM. It is acknowledged that the Project would require sewer service and modification of the village limit line. These are expressly addressed as part of the analyses in Chapter 1.0, <i>Project Description</i>, Section 3.1.5, <i>Land Use and Planning</i>, Section 3.1.8, <i>Public Services</i>, and Section 3.1.10, <i>Utilities and Service Systems</i>. Project Facility Availability Forms, or “will serve” letters, have already been obtained from water and sewer providers (see Appendix O of the EIR). However, placing additional housing in close proximity to an existing village provides an efficient development pattern by allowing the County to maximize existing infrastructure, provides for efficient service delivery, and strengthens town center areas (see County of San Diego General Plan, page 3-2).</p> <p>Response to Comment O1-7</p> <p>Potential direct and indirect agricultural impacts are addressed in EIR Section 3.2.1, <i>Agriculture</i>. These impacts were identified as less than significant during preparation of the Project Initial Study, for reasons explained in that discussion. Similar to the direction in LU-6.4 to “conserve open space and</p>
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	<p>natural resources,” the goal is addressing preservation of existing conditions. There are no existing on-site agricultural uses to conserve, as indicated in the both Figure 2.3-1, <i>Vegetation and Sensitive Resources</i>, and in Chapter 4.0, <i>Alternatives</i>, in the description of the Section 4.2.1, <i>No Project, No Development Alternative Description and Setting</i>, which references the “native and non-native habitat throughout the site.” There is no need to additionally address impacts related to “reduction in land use diversity,” which is not an element of the policy.</p>

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<p style="text-align: right;">Comment Letter O1</p> <p>Water Quality Standards and Requirements. GP Policy LU-14.4 (Sewer Facilities), states that sewer services are not allowed to induce unplanned growth and shall not be extended beyond Village boundaries except when necessary for public health, safety, or welfare; when within existing sewer district boundaries; when necessary for a conservation subdivision adjacent to existing sewer facilities; or where specifically allowed in the CP. None of these conditions are present in the Project case. Please explain which LU-14.4 exemption applies to the Project. Note that extending the Village limit line is growth inducing of itself, violates General Plan Guiding Principles, and is not justification for evading the intent of the growth restriction imposed by this policy. In fact, the Project has not provided a single compelling reason for the expansion of HGV. The latest GP Progress Report shows no housing shortage. The applicant must demonstrate, with supporting evidence, a significant improvement for the community and the County to justify this GPA.</p> <p>Emergency Response and Evacuation Plans (page 3.1.6-19). The DEIR states the Project will comply with current policies in the Mobility and Safety elements and therefore would “reduce impacts associated with emergency response and evacuation plans from Project implementation.” But all stated mitigation is only within the project footprint or the short road to Harmony Grove Road. The significant local area impact of thousands of additional vehicles using Country Club Drive during evacuations is not addressed or mitigated. This oversight represents a critical impact with life-threatening consequences for existing residents of Harmony Grove that must be identified, analyzed, and appropriately mitigated outside the Project footprint. Please see further specific comments in the addendum on fire protection plan.</p> <p>Wildland Fires. Although the DEIR identifies the Project as <u>introducing additional ignition sources</u>, it does not mitigate for this increased fire risk outside of the Project footprint. This area-wide increase in fire risk is not proven to be “less than significant” and must be identified, analyzed, and appropriately mitigated outside the Project footprint. Please see article about residents’ concerns over evacuation routes during the Cocos fire to understand baseline conditions in the area: http://www.kpbs.org/news/2015/may/13/harmony-grove-residents-worry-about-evacuation-rout/</p> <p>Land Use Policies and Regulations Conformance. “Policy LU-1.1 states that land use designations on the Land Use Map are to be assigned in accordance with the CDM and boundaries established by the Regional Categories Map.” Project is said to be consistent with the CDM: “The Project’s most intense uses are located within 0.5 mile of the adjacent HGV Village Center where HGV’s highest densities are also located.” In accordance with the CDM, HGV has its lowest density, horse-keeping models, the Hillside Farmhouses, sited at its perimeter along Harmony Grove Road across the street from the Project. Therefore, the Project’s multifamily units would considerably increase density from its nearest Village neighbors and would not re-establish these low-density borders and horse-keeping land uses on its own property to conform to the CDM. If this Project begins its own CDM it would be starting its own village, which would be an instance of leapfrog development prohibited by GP LU 1.2. Please clarify how this project complies with LU-1.1 and LU 1.2.</p> <p>Consistency with the Scale and Orderly and Contiguous Growth of HGV. Once again, the Project makes assumptions based on establishing its own CDM, which would mean it is a new village, indeed, leap frog development, rather than an expansion of an existing village. The EIR should be consistent with the</p> <p style="text-align: center;">3</p>	<p>Response to Comment O1-8</p> <p>The comment states that the Project is inconsistent with LU-14.4. However, the Project will be consistent with LU-14.4 upon its designation as a village. The Project is proposing to amend the General Plan Regional Land Use Map to redesignate the portion of the site served by the Project sewer as “village” pursuant to Policy LU-1.4 (expansion of existing HGV Village). Once the Project is designated as a village, it would fall within the criteria of LU-14.4.</p> <p>With respect to the comment regarding extending the village limit line as violating General Plan guiding principles, please see Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis for a thorough discussion on this issue.</p> <p>The assertion that a housing shortage must be demonstrated or significant improvement for the community must be shown to “justify” or support a General Plan/Community Plan amendment is incorrect. Nothing in the General Plan requires that such factors be considered or demonstrated before approving a General Plan/Community Plan Amendment.</p> <p>To the broader issue, while the San Diego Association of Governments (SANDAG) Regional Housing Needs Assessment shows that the County has planned for the necessary number of housing units over the assessment period, the County is behind in the number of approvals one would expect per year if housing availability is averaged over the planning period (see the Housing Scorecard at: http://www.sdchamber.org/wp-content/uploads/2017/03/Housing-Score-Card.pdf). Without approval of a substantial number of residential units over the next few years, the County will have a housing shortage.</p> <p>The County respectfully disagrees that the Project is growth-inducing, please refer to discussions in Subchapter 1.8 of the EIR. The discussion addresses potential for growth-inducement impacts relative to land use policy changes and construction of housing, provision of public utilities or services, roadway</p>

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	<p>improvements, and extension of public utilities, concluding that Project-related growth-inducing impacts would be less than significant.</p> <p>Please also see Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis.</p> <p>Response to Comment O1-9</p> <p>The Fire Protection Plan (FPP) analyzes evacuation from the Project. The Project would widen Country Club Drive from its intersection with Harmony Grove Road to the southernmost HGV South Project entrance to three minimum 12-foot-wide travel lanes. This provides additional capacity for evacuation. The three access points into the Project from Country Club Drive provide the ability to move vehicles out while responding emergency personnel travel inbound. The FPP includes a conservative estimate of the number of vehicles, which accounts for existing residents, as stated in the FPP on page 34:</p> <p><i>The project's traffic engineer states that each lane can effectively handle 1,900 vehicles per hour. There are roughly 60 existing residential units that rely on Country Club Drive as their only means of ingress/egress. With the maximum unit site plan for HGVS, an additional 453 residences would be added. If a conservative estimate of three cars per household is used (the California average is roughly 2.7 vehicles – U.S. Census Bureau 2016), there would be a total of approximately 1,584 vehicles seeking egress, assuming worst case. The actual number of vehicles would likely be much lower than this. For example, if a fire occurred during the daylight hours, many of the vehicles would already be off-site. If a fire occurred at night, families are likely to evacuate in one or two vehicles. Conservatively assuming three vehicles per household are evacuating, with one lane, all existing and proposed residences could evacuate within one hour and still be approximately 316 vehicles below the capacity. The extra evacuation lane essentially doubles the capacity and</i></p>

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	<p><i>provides a significant buffer of 2,216 vehicles per hour over what would otherwise be necessary.</i></p> <p>Please also see Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access for this and additional information about mass evacuation. Please also see the Rohde & Associates report on the Project website for additional analysis on evacuation.</p> <p>Section 3.1.3, <i>Hazards and Hazardous Materials</i>, of the EIR concludes that impacts associated with wildland fire hazards would be less than significant. The statement that the EIR “identifies the Project as introducing additional ignition sources” is not understood. Searches were run for the words “additional,” “ignition,” and “increase.” No reference to increased ignition danger was found. Rather, discussion was of ignition-resistant construction elements or reductions in vegetation prone to ignition due to the Project. Indirect impacts also were not identified as significant.</p> <p>The Project would not expose people or structures to a significant risk of loss, injury, or death from wildland fires. The Project would comply with the FPP that has been prepared in conformance with the County Consolidated Fire Code, and would be in compliance with the fire codes by including as design features of the Project, the specifically developed measures and features (detailed in Section 5.2.1.2 of the FPP). Please also see Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>HGV did not place its lowest-density and horse-keeping properties along Harmony Grove Road across from the Project. HGV lowest-density units are located in “The Groves” area at the northern extent of that project. Please see Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis.</p> <p>The commenter incorrectly states that the Project is establishing its own CDM, making it a new village under LU-1.2. The Project does not meet the definition of leapfrog development under Policy LU-1.2 because the Project proposes to be designated as a “village” by expanding the existing or planned village of</p>

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	<p>HGV pursuant to the criteria outlined in policy LU-1.4. Therefore, the Project's Village densities will not be located away from an established Village. Rather, the Project will expand the existing village of HGV consistent with CDM. This Project proposes to amend the General Plan Regional Land Use Map to redesignate a portion of the Project site to "village" pursuant to Policy LU-1.4. In particular, the Project proposes an expansion to an existing Village commonly identified as the HGV that would comply with the CDM (Harmony Grove Subarea Community Plan, page 48). Please see to Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis for a thorough discussion on this issue.</p>

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<p style="text-align: right;">Comment Letter O1</p> <p>character of this application for a GPA either as an expansion continuing the established CDM, or as a new village establishing a second CDM.</p> <p>Consistency with Community Character. The Project assumes that because HGV was approved, an expansion of that village would be similarly approved. However, HGV was designed by the County to accommodate a population increase while <i>limiting further urbanization</i> through the density pattern of the CDM. The DEIR states that “HGV South would provide a transition from the existing surrounding community by maintaining these perimeter areas within the existing Semi-Rural regional category.” But in fact, the Project destroys the transitional buffer and violates the CDM by re-establishing urban densities outside of the village limit line and beyond the lowest-density horse keeping properties within HGV.</p> <p>For these reasons, we strongly disagree with the Project conclusion that “impacts associated with the goals and policies of the County General Plan related to land use would be less than significant.” The impact on the community character of the destruction of the original CDM and the alteration of the critical urban/rural balance should be identified, analyzed, and mitigated. We believe that the General Plan Consistent with Septic Alternative is more harmonious with community character and is superior to the Project in meeting project objectives. Please see further comments on the General Plan Consistent with Septic Alternative in the addenda.</p> <p>Emergency Access. The Project states it would be consistent with relevant policies by implementing a fire protection plan and traffic mitigation to reduce impacts to below a level of significance. Please provide evidence to support this statement. We believe that without a secondary access route, the project is unable to mitigate the significant public safety risks of traffic congestion during evacuation for wildfire or earthquake emergencies. See further specific comments in the addenda on the fire protection plan.</p> <p>Elfin Forest and Harmony Grove Portion of the San Dieguito Community Plan (3.1.6-35)</p> <p>The Project notes it is consistent with the Community Growth Policy because it would be “proposing a clustered residential development in accordance with the CDM.” This is not the case because the Project’s multifamily unit density is located beyond the lowest density housing in HGV, violating the CDM pattern. Therefore, these assumptions are not supported and new evidence must be provided to support these claims.</p> <p>The Project is inconsistent with many goals and policies of the HG CP, but proposes to simply amend the CP to add the Project as an independent but compatible component of the HGV Specific Plan. However, the CP <i>specifically prohibits</i> this expansion and cannot be disregarded simply because the Project is inconsistent (from page 21 of the County-approved HG CP, emphasis added):</p> <p>ISSUES THAT NEED TO BE CONFRONTED</p> <ul style="list-style-type: none"> • <i>The Village development pattern as shown in the General Plan Land Use Map must be strictly adhered to as the formal development model for the area.</i> <p style="text-align: center;">4</p>	<p>Response to Comment O1-10</p> <p>The County respectfully disagrees the Project would impact community character or is inconsistent with the CDM for reasons explained in the Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis. The preference for the General Plan Consistent with Sewer Alternative is noted. The aesthetic effects of the alternative, and the comparison with those of the Project, were addressed in Section 4.3.2 of the DEIR. As noted, the alternative would provide housing more consistent with uses to the east and west, but not as consistent with uses to the north. There could be greater variation among lot uses, but the lots would extend further into areas retained as open space under the Project, and increasingly visible to off-site viewers. There is also a possibility that those homes would experience less dense landscaping than the Project due to individual homeowner preference. Finally, when all grading and construction is complete, this alternative would place 50 percent of the site into residential lots and streets, whereas the Proposed Project would place 31 percent of the site into residential lots and streets. Balancing these issues overall, the alternative and Project were found similar under CEQA, and both less than significant relative to long-term effects. The difference in objective attainment for each of the eight objectives is also detailed in the section. The alternative would not meet objectives to the same extent as the Proposed Project due to the smaller number and more uniform nature of the homes, the encroachment farther south into sensitive habitat, etc.</p> <p>Response to Comment O1-11</p> <p>Please see Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment O1-12</p> <p>Please see Global Response to General Plan/Community Plan Amendments CEQA Impact Analysis.</p>

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<p style="text-align: right;">Comment Letter O1</p> <ul style="list-style-type: none"> • <i>Urban homes must not outnumber the rural homes to maintain the rural voice and preserve the rural heritage of this historic community.</i> • <i>Annexation of Harmony Grove properties into adjacent cities allows landowners to escape the rural community development standards and must be discouraged</i> <p>Indeed, the GP LU-2.4 (Relationship of Land Uses to Community Character), requires projects to “Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.” The Project cannot change the CP solely to meet the Project needs, but rather, the Project must change to reflect the objectives of the CP. Therefore, the claim that the Project may amend the County-approved, GP-consistent CP to avoid its own inconsistencies is unfounded and should be withdrawn, as it would violate LU-2.4.</p> <p>Thank you for the opportunity to comment.</p> <p>Sincerely,</p> <p>Douglas Dill</p> <p>Chair, Seat 15 San Dieguito Planning Group</p> <p>cc: EFHGTC</p> <div style="position: absolute; right: 0; top: 200px;"> <p>O1-12</p> <p>O1-13</p> <p>O1-14</p> </div>	<p>Response to Comment O1-13</p> <p>The Project does not propose annexation into any adjacent city. No further response is required.</p> <p>Response to Comment O1-14</p> <p>LU-2.4 has to be considered in the context of other General Plan policies, which allow for land use changes, such as and expansion to an existing village (LU-1.4) or establishment of a new village (LU-1.2). It has been well established that state law does not require a precise match between a project and the General Plan, nor does a project need to be in perfect conformity with each and every General Plan policy. Rather, to be consistent, a project must be compatible or in harmony with a General Plan’s objectives, goals, and policies. A project is considered to be compatible with the General Plan if considering all aspects of the project, it will further the objectives and policies of the General Plan (<i>Corona-Norco Unified Sch. Dist. V. City of Corona</i> [2001] 13 Cal.App.4th 1577; see also <i>Sequoyah Hills Homeowners Ass’n v. City of Oakland</i> [1993] 23 Cal.App.4th 704).</p> <p>The land use and densities being proposed by the Project reflect the unique issues, character, and development objectives of the Harmony Grove/Elfin Forest Community Plan area, in addition to the General Plan Guiding Principles. The Project is located contiguous to the HGV area of the Harmony Grove/Elfin Forest Community Plan. HGV South will expand HGV Village pursuant to the requirements set forth in General Plan Policy LU-1.4, and will further implement the CDM by concentrating the highest densities of uses closest to HGV while decreasing intensities adjacent to semi-rural land uses and nearby open space areas. The Project also proposes to amend the Community Plan to add the Project as an independent but compatible component of the HGV Specific Plan. The Project will follow as appropriate the policies described in the Community Plan and the HGV Specific Plan Area of the Community Plan. For example: (1) the Project will provide a transition from the Village portion of HGV South and HGV Village Center to the existing surrounding residential and rural uses by maintaining approximately 58 acres around the perimeter of the site within the existing Semi-Rural regional category (Goal SPA-1.1); (2) the Project also incorporates various design</p>

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	<p>features to reduce visual effects along the Project perimeter by preserving biological open space areas around the southern portion of the property (CO S-3.2); (3) the Project provides a system of trails that connect the Project with HGV and the surrounding community (Policy SPA-2.2.3); (4) the Project will provide a range of housing, a local-serving commercial area and walkable core (Goal SPA-4.1); and (5) the Project will comply the County's dark nightline sky ordinance (Goal SPA-2.3).</p>

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<p style="text-align: center;">Comment Letter O1</p> <p>Addenda</p> <p>General Plan Consistent with Septic Alternative</p> <p>According to this DEIR, the General Plan Consistent with Septic Alternative (Septic Alternative), which was suggested by this planning group among others, failed to meet Project Objective 1 of “Efficiently develop property in close proximity to an existing village consistent with the Community Development Model to create one complete and vibrant community that would enhance and support the economic and social success of the village and Project by increasing the number and diversity of residential opportunities.” The Septic Alternative <u>does</u> efficiently develop in proximity to an existing village consistent with the current CDM, which was carefully planned by the County to surround the existing Village with estate-style rural ranchettes. From the GP, page 3-5: “The Land Use Element establishes a model for community development based on a physical structure defining communities by a “village center” surrounded by semi-rural or rural land...Semi-rural neighborhoods surrounded by greenbelts, agricultural uses, or other rural lands would be located outside the more urbanized portion of the community” and on page 3-6: “The Community Development Model directs the highest intensities and greatest mix of uses to Village areas, while directing lower-intensity uses, such as estate-style residential lots and agricultural operations, to Semi- Rural areas. The Semi-Rural category may effectively serve as an edge to the Village, as well as a transition to the lowest-density category, Rural Lands, which represents large open space areas where only limited development may occur.” The Septic Alternative is thus more consistent with the CDM, while the Project is less consistent.</p> <p>The Septic Alternative, with homes similar to existing Harmony Grove homes, also supports the vibrant Harmony Grove rural historic community better than does the much more urban Project. The Septic Alternative certainly will accommodate “a portion of the projected population growth.” And by providing the much needed low-density rural residences called for by the CDM and with possible secondary home sites, all on large lots with horse-keeping privileges, this alternative increases the number and diversity of residential opportunities as least as much as does the project, which provides only two types of high-density urban units. In addition, this alternative, and not the Project, meets the Community Plan objective of providing a balance of urban and rural homes so that the rural voice is not lost.</p> <p>Because this 49-home development is designed in full compliance with the Community Plan and GP CDM, it supports the success of the community-planned, approved Village. Because the Project places many high-density urban units within the promised rural buffer zone, it may actually threaten the success of Harmony Grove Village, which is advertised as “a master planned community that blends a rural landscape with modern design sensibility” (HGV website) “Rural meets Urban” and “Nature meets Home” (HGV banners). The Project, which does not comply with the planned lower-density rural buffer called for by the County’s CDM, upsets the carefully planned rural-urban balance, threatens the rural setting promised for the HGV, requires a GPA, and does not comply with the Community plan. Therefore, the Project does not meet Objective 1 as well as does the Septic Alternative.</p> <p>The DEIR concludes the Septic Alternative is also less consistent with Objective 2 because it would not contribute to multi-modal transportation including walking or bicycling by locating near transportation</p> <p style="text-align: center;">6</p>	<p>Response to Comment O1-15</p> <p>Please note that while the general introduction text on EIR page 4-13 states that the alternative would not support the goal, the detailed part of the objectives consistency text expands upon the concept and provides rationale, stating that:</p> <p style="padding-left: 40px;"><i>The low density, dispersed pattern of development provided in this alternative would limit the ability to fully meet Objective 1 because it would not provide an efficient development pattern in close proximity to an existing village consistent with the Community Development Model (CDM)” (emphasis added). The General Plan Consistent with Septic Alternative has a limited ability to support the economic and social success of the existing village (Objective 1) when compared to the Proposed Project because the substantial decrease in number of residents would not provide the same level of support to HGV’s commercial uses and the alternative would lack the diversity in land uses needed to promote social interaction.</i></p> <p>In the full analysis, it is not that the alternative fully fails, but rather that it does not satisfy Objective 1 <u>to the same extent</u> as the Proposed Project. In this instance, the alternative design does not represent an efficient residential development model that enhances and supports the economic and social success of the village or the surrounding areas to the same extent as does the Project. The Project provides greater support to the existing village uses, and increases the number and diversity of residential options, more efficiently by a greater number of residences, and a greater diversity of residence types, than a smaller number of single-family residences.</p> <p>The County agrees that the General Plan Consistent with Septic Alternative is consistent with the CDM. The County also finds the Proposed Project consistent with the CDM development pattern. Please refer to Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis.</p>

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	<p>Response to Comment O1-16</p> <p>The comment asserts that the alternative supports a vibrant Harmony Grove “rural historic community” better than the “urban” Project. However, supporting a vibrant “rural historic community” is not a Project objective. Rather the first Project objective expresses the desire to <i>create one complete and vibrant community</i> that would enhance and support the economic and social success of <i>the village and Project</i> by increasing the number and diversity of residential opportunities.” As explained in Chapter 4.0 of the EIR, the alternative, with only 49 single-family residential units, has only a limited ability to support the economic and social success of the existing village when compared to the Proposed Project because the substantial decrease in number of residents would not provide the same level of support to HGV’s commercial uses and the alternative would lack the diversity in land uses needed to promote social interaction.</p> <p>The commenter also asserts that the alternative will accommodate a portion of projected population growth. While this statement is correct that the alternative would provide a minimal amount of housing to satisfy “a portion” of projected population growth, this is not the underlying purpose of the Project. Although a part of the underlying purpose of the Project is to accommodate a portion of the projected population growth and housing needs in San Diego County, the overall purpose of the Project is to accommodate population growth by expanding an existing village that will further enhance and support the success of that village and create a complete and vibrant pedestrian-oriented sustainable community that provides a variety of housing types for a diverse range of incomes and lifestyles.</p> <p>The alternative would not increase “the number and diversity of residential opportunities at least as much as does the Project” as stated in the comment. In terms of number of residences, even if one assumes that each home would incorporate “possible secondary home sites” the total number of residences would be 98, less than 25 percent of the number proposed under the Project. Relative to diversity, those homes would all be single-family residences, as compared to the Project, which would provide single-family residences on a variety of lot sizes, as well as options for multi-family housing, which is</p>

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	<p>currently lacking in HGV. Also, there is nothing that substantiates the commenter’s assertion that there is a “much needed” demand for low-density rural residences.</p> <p>Finally, with respect to the comment that the alternative meets the Harmony Grove community plan objective of providing a balance of urban and rural homes so rural voice is not lost, please see Global Response General Plan/Community Plan Amendments CEQA Impact Analysis. This comment is related to a project’s consistency to the County’s General Plan and Community Plan, not to the question of whether an alternative would meet the Project’s objectives relative to CEQA Guidelines Section 15126.6(c).</p> <p>Response to Comment O1-17 Please refer to Response to Comment O1-19 regarding why the alternative would not meet Objective 1 to the same extent as the Proposed Project, and Response to Comment O1-2 regarding consistency with the CDM. Please also see Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis.</p> <p>Response to Comment O1-18 The County does not agree that the alternative would meet Objective 2 in the same manner as the Proposed Project. While there would be potential for residents to have horses in the alternative (and that would certainly provide a non-motorized form of transportation), the focus of the discussion was on the lack of trails or pathways that would be provided by the alternative. As an alternative that could be developed by individuals following sale of individual lots, and with no Homeowners Association to construct and maintain trails, the alternative would not support the ability to walk, bike, or even ride horses in the same way as the Proposed Project as there would not be any alternative-related community trail, primitive trail, or pathway implementation that would support those activities out of roadbed and out of potential conflict with vehicular uses.</p>

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<p style="text-align: right;">Comment Letter O1</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>centers. This is not supported by the facts, as this alternative would be just as close to regional transportation centers as is the Project, similarly allows walking and bicycling, and would add another means of transportation via horseback riding, thereby increasing the diversity of transport methods more than the Project does.</p> <p>The DEIR concludes the Septic Alternative is similar to the Project for Objective 3. We can expect the alternative to be similar to the Project for Objective 4, where the large lot sizes and nearby trail system that connects to County parks would provide ample space for a variety of active and passive recreational opportunities.</p> <p>The DEIR also concludes this alternative is less consistent with Objective 5, which requires a diversity of housing choices and land uses that support a diversity of residents. The Septic Alternative proposes 49 custom home sites that accommodate many leisure and recreational diversions and agricultural uses on-site with the possibility of smaller secondary dwelling units (SDUs) for elderly or young adult family members. As such, it may encourage at least as much resident diversity as the Project's urban multifamily apartments and high-density urban homes, two choices that arguably attract the same type of city home buyer. Because high-density urban units are already plentiful in the Village, the Project does not add more true diversity as well as does the Septic Alternative, where the large lots support more variety in housing styles. In addition, the large lots allow for more diverse land uses such as small family farming opportunities and can provide additional family income sources through horse boarding or small scale farming.</p> <p>The Septic Alternative is more consistent with Objective 6 that requires development compatible with existing and planned development in the immediate vicinity, which is currently designed as a rural buffer. Surrounding homes of large lot, on-septic ranchettes with horses and the larger HGV Hillside Farmhouses are very compatible with the Septic Alternative. There is a planned public equestrian ranch in the immediate vicinity as well.</p> <p>Objective 7 is well met by the Septic Alternative in that it encourages walkability and social interaction with the existing close-knit, established rural community. This alternative also meets the Community Plan objective of providing a balance of urban and rural homes so that the rural voice is not lost. This balance is critical to the success of the Village.</p> <p>Missing in the Alternative Analysis is the relative impact on the safety of current and future residents of a project with fewer dwelling units. It stands to reason that in the likely case of an evacuation 49 homes would pose less of an impact on evacuating traffic and provide a greater chance for the existing residents to avoid fatal entrapment, than would the 453 homes proposed by the Project.</p> <p>The Septic Alternative will also avoid the adverse "edge effects" that can degrade sensitive habitat. This impact occurs when high-density urban development is situated immediately next to protected open space preserves, in this case, the Del Dios Highlands County Park and the Elfin Forest Recreational Reserve.</p> </div> <div style="width: 5%; text-align: center;"> <p>↑</p> <p>01-18</p> <p>↑</p> <p>01-19</p> <p>↑</p> <p>01-20</p> <p>↑</p> <p>01-21</p> <p>↑</p> <p>01-22</p> <p>↑</p> <p>01-23</p> <p>↑</p> <p>01-24</p> </div> </div>	<p>Response to Comment O1-19</p> <p>Relative to Objective 4 being obtained to the same extent under both the alternative and the Proposed Project, the County respectfully disagrees. The comment is correct that the number of planned trails (and existing trails in Del Dios Highlands Preserve and Elfin Forest Recreational Reserve) would remain the same under both scenarios. A key difference, however, is related to the fact that none of the planned trails would be improved and provided for use under the alternative, whereas the Proposed Project would implement a pathway down Country Club Drive, connect to multi-use trails off-site, complete multi-use trail portions and a trail head on-site, and reinforce/improve the existing primitive trail accessing the Del Dios Fire Road, none of which would occur under the alternative (please see EIR Figure 1-17, <i>Trails and Pathways Plan</i>, and rationale in Response to Comment R-O1-22 of this letter). Similarly, the objective also refers to the park opportunities provided by the Proposed Project (please refer to EIR Figures 1-20c, <i>Conceptual Park Plans</i>, and 3.10-1, <i>Proposed Public and Private Park Locations</i>), for recreational opportunities that would be provided to the public under the Proposed Project and which would not be available under the alternative development. For these reasons, the EIR correctly stated that "the alternative would be less effective in meeting Objective 4."</p> <p>Response to Comment O1-20</p> <p>The alternative would provide residential uses with some ancillary potential uses (private agricultural or large animal keeping consistent with the alternative lot sizes), as suggested in the comment. The alternative, however, would be uniform in providing single-family housing on larger lots. Additionally, potential ancillary uses are speculative, as the potential for their occurrence is not the same thing as their provision and there is no guarantee that homeowners would use their lots for anything other than residential purposes. The Proposed Project is considered more diverse in that it is designed to (and would be required to) provide single-family and multi-family residential uses of varying sizes and formats, recreational uses for both Project residents and community members, as well as some limited commercial and civic opportunities. This is a more diverse group of uses that would more fully contribute to residential options and support uses (such as recreational</p>

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	<p>opportunities) within the Project versus the alternative, which offers large lot single-family residential uses that allow unguaranteed potential for some ancillary uses of agricultural or large animal keeping consistent with the alternative lot sizes).</p> <p>Response to Comment O1-21</p> <p>The County agrees that the alternative is consistent with Objective 6 relative to compatibility with existing and planned land uses. But unlike the Project, the alternative is not more compatible with the adjacent HGV. Also, similar to Response to Comment O1-20, that does not comprise the total objective. Objective 6 is to:</p> <p><i>Create a mixed-use development that is compatible with existing and planned development in the immediate vicinity of the property while optimizing the operational effectiveness of public facilities and services of the Project and the existing village by increasing the number and diversity of residents within the Project.</i></p> <p>Please refer to Response to Comment O1-20 regarding mixed uses and increases in number and diversity of residents within the Project and its increased consistency with the objective.</p> <p>Specific to the HGV planned Equestrian Ranch across Country Club Drive, both the alternative and the Proposed Project would be compatible with this planned private facility (described as private in the HGV EIR 2007:1-7). As described in Section 3.2.1, <i>Agriculture</i>, under “Indirect Effects” of the HGV South EIR:</p> <p><i>...potential nuisance effects would be reduced to below a level of significance through the use of an environmental design feature. Disclosure statements would be included in sales documentation for all proposed residential units. The statements would notify potential owners that the adjacent property could potentially be used for agricultural operations and that there could be associated issues such as odors, noise, and vectors. Indirect impacts were found less than significant with the inclusion of this environmental design feature. The small potential number</i></p>

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	<p><i>of large animals associated with abutting residential lots, the buffer provided by Country Club Drive and associated landscaping that would provide a buffer between the future Equestrian Ranch and HGV South, and the disclosure statement regarding the future equestrian ranch required as an environmental design feature (see Table 1-2 and Chapter 7.0), all combine to render indirect Project impacts to agricultural resources as less than significant.</i></p> <p>Response to Comment O1-22</p> <p>It is unclear how the alternative would encourage walkability etc. without trails. Please refer to Response to Comment O1-19. The alternative also would not provide a destination gathering place as part of Project design, which is an explicit part of the Proposed Project description. Please refer to Response to Comment O1-16 regarding the urban quality. This is not an element of Objective 7. Rather, this comment is related to a project’s consistency to the County’s General Plan and Community Plan, not to the question of whether an alternative would meet the Project’s objectives in accordance with CEQA Guidelines Section 15126.6(c).</p> <p>Response to Comment O1-23</p> <p>The alternatives section proposes reasonable alternatives that address significant impacts assessed to the Project through proposing alternatives “which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project” in accordance with CEQA Guidelines Section 15126.6. Safety issues were found to be less than significant, in accordance with analysis provided in Section 3.1.3, <i>Hazards and Hazardous Materials</i>, of the EIR. As such, the topic was not one identified for discussion in Chapter 4.0.</p> <p>Response to Comment O1-24</p> <p>Project edge effects were extensively addressed in the Project <i>Biological Technical Report</i> (Appendix E to the EIR) as well as the EIR. Potential edge effects have been fully discussed in Subchapter 2.3, <i>Biological Resources</i>, under the headings “Core Wildlife Area (Guideline 7),” “Indirect Impacts/Edge Effects (Guideline 8),” “Wildlife Access (Guideline 19),” “Local and Regional Wildlife Corridors and Linkages (Guideline 20),” and</p>

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	<p>“Cumulative Impacts to Wildlife Movement and Nursery Sites.” Guideline 8 discussion in particular specifically addresses increased human activity, domesticated animal effects, introduction of invasive non-native plant species, and night lighting. The conclusion was that Project-related long-term impacts to sensitive species from indirect edge effects would be less than significant. In addition, “Required installation of fencing and signage around the BOS, dedication of a BOS easement, protection of the BOS by a limited building zone easement, and implementation of the RMP for the Proposed Project, would further minimize potential edge effects over the long-term.” The approximately 35 acres of biological open space located between the development footprint and the Del Dios Highlands Preserve (DDHP) would lower potential effects on DDHP open space. The Elfin Forest Recreational Reserve is located further away and therefore less than significant impacts would be even further diminished. This distance between the Project and DDHP would not be the case with the alternative, which would place residential uses and associated human and human-related activities closer to the DDHP boundaries.</p>

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<p data-bbox="768 237 940 256">Comment Letter O1</p> <p data-bbox="218 315 932 380">Therefore, we believe that the General Plan Consistent with Septic Alternative is superior to the Project in meeting project objectives, inflicting less environmental impacts, and ensuring greater public safety, and should thus replace the Project as the most suitable alternative for future development of this site.</p> <p data-bbox="961 342 1014 362">O1-25</p> <p data-bbox="573 1325 583 1344">8</p>	<p data-bbox="1077 172 1451 198">Response to Comment O1-25</p> <p data-bbox="1077 212 1990 277">Comments noted. Please refer to Responses to Comments O1-15 through O1-24.</p>

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<p style="text-align: center;">Comment Letter O1</p> <p>Comments on Fire Safety and Emergency Access/Egress</p> <p>HGVs Fire Protection Plan</p> <p>This report states that the Project would “introduce potential ignition sources” but is “less susceptible to wildfire.” While this development may have a lower flammability landscape, the surrounding neighborhoods do not. The increase in fire risk to area residents imposed by this introduction of additional potential ignition sources should be thoroughly analyzed and adequately mitigated. Evacuation is typically commenced before there is any immediate danger from fire, so the relative durability of the Project landscape cannot be considered a factor in “facilitating” evacuation. The Project is located in a very high fire severity zone area and the Project would substantially increase the use and congestion of the existing evacuation routes. Please describe how the Project, which requires that an additional 453 residential units use the only exit route together with thousands of HGV residents and hundreds of original rural residents would “facilitate resident evacuation in a wildfire emergency.” Please provide reference sources or data supporting this statement.</p> <p>According to the County’s own commissioned Rhode Wildfire Risk Assessment study (page 14), Harmony Grove Road cannot be considered as an evacuation route: “This route has critical exposures to heavy wildland fuels in both directions from the intersection of Country Club Dr., and poses severe entrapment potential during wildfire movement. This danger begins immediately east bound (towards Escondido) and approximately 1/2 mile west (towards Elfin Forest). Similar routes have contributed to numerous deaths to wildfire exposure in San Diego County. (Wildcat Canyon, Cedar Fire, 2003). There is also potential for long range spotting to develop fire related obstructions on this road well ahead of the main fire. The road will also be subject to downed power lines, rock fall and related hazards. Outside of the area of Harmony Grove Village, no safety zones are located along this road. This road is not recommended for fire evacuation.”</p> <p>From the Rhode study (page 15): “Concern had been expressed that only one route was proposed for access/egress to the proposed development site rather than the code required construction of two, and that a variance would be requested/required for the project to move forward. In contrast, the consultant staff and public safety officials who participated in the field tour of the site unanimously agreed that the site has 4 potential routes of egress during evacuation, two with strong viability. All participants expressed comfort that the proposed variance for the 800 foot single access road was acceptable.” According to this study and the expressed opinion of all consulting fire safety experts, two of these routes, east- and west-bound Harmony Grove Road, are too dangerous to be considered evacuation routes. The third route, Harmony Grove Village Parkway, is also compromised and is not considered safe enough to be a principal evacuation route (Rhode study, page 15): “The road traverses through tract homes initially, but presents an area of risk where the bridge over Escondido Creek offers brief exposure to heavy wildland fuels, however the burn-out time for these fuels may be 15 minutes and the duration of any required closure could be short. This condition would only pose risk during extreme fire behavior, and should be acceptable during lesser fire events. Consultants and public safety staff evaluators recommend this route as the alternate escape route.” However, the only route to Harmony Grove Village Parkway from the Project is Country Club Drive, which means Country Club Drive northbound is the</p> <p style="text-align: center;">9</p>	<p>Response to Comment O1-26</p> <p>Please see Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. It is noted that the commenter states that the FPP should have analyzed the increase in fire risk to area residents resulting from the Project’s introduction of additional potential ignition sources and should identify adequate mitigation measures. Potential “risk” that is related to the Project site would be attenuated by Project design, as described in the FPP and alluded to in the comment.</p> <p>Response to Comment O1-27</p> <p>The comment provides extensive text from the Wildland Fire Risk Analysis Report (Rohde & Associates 2016). However, the text is presented out of context and then used to suggest that there is only one possible evacuation route available in the Harmony Grove area—Country Club Drive—and that even it is not safe. However, the Rohde & Associates report indicates that there are four potential evacuation routes available for ingress/egress from the area during evacuations: The conclusion of that report’s analysis was:</p> <p style="padding-left: 40px;"><i>In contrast, the consultant staff and public safety officials who participated in the field tour of the site unanimously agreed that the site has 4 [sic] potential routes of egress during evacuation, two with strong viability. All participants expressed comfort that the proposed variance for the 800 foot single access road was acceptable.</i></p> <p>There are four potential evacuation routes. Route 1 is Harmony Grove Road to the west into developed areas of coastal cities. This option would be viable for evacuation unless a wildfire were threatening the fuels throughout the canyons west of Harmony Grove. Route 2 is Harmony Grove Road into Escondido. This route is viable for evacuation unless fires were burning in the native fuels to the south or east of the roadway. Route 3 is Country Club Drive to the north, then east to Harmony Grove Road, into Escondido. This route is viable and bypasses some of the large expanses of native fuels east of Harmony Grove Road. Route 4 is Country Club Drive to the north into Escondido. This viable route passes through developed and maintained landscapes with some larger</p>

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<p style="text-align: right;">Comment Letter O1</p> <p>ONLY safe route for evacuation for this severe high fire risk area. If this one road is blocked, fatal entrapment could result. This eventuality is not discussed or mitigated in this report and must be addressed.</p> <p>Country Club Drive is also the main evacuation route for HGV, and Project evacuees must share this route with an additional 3,000 cars from HGV evacuating <i>at the same time</i>. Cumulative traffic analyses should be provided to ensure that the anticipated load (~5000 cars/h) on this two-lane rural collector is within safe levels, and this would be a minimum, not considering the hundreds of vehicles that may be using this route to evacuate from other fire-prone areas. Given this scenario, the burn history of the area, and the high potential for loss of life, the wisdom of a waiver for a secondary access road for the Project must be more strongly defended.</p> <p>Please describe how the proposed mitigation measures reduce the potential for impairment of this single exit road, Country Club Drive, by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access. Proposed mitigation (#1) includes an additional travel lane for increased evacuation within the Project, but does nothing to lessen the inherent risks of a single exit route for thousands of vehicles. From the Rhode study (page 15): <i>"Per traffic engineering standards cited by Dudek, this improvement will provide capacity for 1,828 vehicles/hour. It appears however that the report did not include legacy users of this route in addition to the proposed additional use. Given the proposed development size of 457 units + 60 legacy housing units = 517 dwelling units x 4 cars per unit (avg.), provides a demand of 2,068 cars per hour on this road, or slightly in excess to the carry capacity of 1,972 cars/hour cited by Dudek after proposed improvements."</i></p> <p>Please explain how increased parking (mitigation #2) within the Project will <i>"eliminate the potential for roadway obstructions."</i> Please choose another word for <i>"eliminate."</i> This statement fails to consider other common obstructions such as blockage by horse trailers or recreational vehicles or vehicles trying to turn around for alternate routes. Please explain how features designed to reduce susceptibility to landscape or structure fire (mitigation #s 3, 4, or 5) or to provide excessive water flows and extra fire hydrants to respond to on-site fires will affect congestion on evacuation routes or ingress of emergency vehicles. Please include consideration of influx of many County Animal Service and other large vehicles towing horse trailers. Please analyze how prioritizing evacuation routes available to the Project may adversely impact other residents living outside of the Project.</p> <p>Please analyze the possibility that gridlock on the only exit routes may force use of the "temporary refuge area" that is designed to hold only 330 people. This is fewer than the anticipated number of residents of the Project, let alone the area residents who may be trapped by traffic congestion from the Project. Will this refuge be restricted to only Project residents? How will this be enforced? Residents will not want to abandon their pets, so how will this refuge deal with cats, dogs, and maybe chickens and pigmy goats owned by many in this rural area?</p> <p>Harmony Grove WUI Evacuation Plan</p> <p>Harmony Grove is a Wildland-Urban Interface (WUI) community, which means it is at a very high risk for wildfires. As such "This WUI zone poses tremendous risks to life, property, and infrastructure in</p>	<p>Response to Comment O1-28</p> <p>Please refer to the Global for Fire Impact Hazards Analysis for information on why the modification to the dead-end road length code standard was found to not lessen life, health, or safety. See also the Global for Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment O1-29</p> <p>The provided fire protection features referred to in the comment and defined in the FPP (pages 33 to 40) combine to provide a system of fire protection that results in a fire-hardened community. This fire hardening, and ongoing maintenance and inspections that ensure that it remains as designed, enable contingency options to evacuation if the evacuation is considered less safe than temporarily (until the fire front burns through) refuging people in their protected homes or the Project's clubhouse. This directly affects evacuation of the area by potentially resulting in fewer vehicles using the roads to evacuate and providing a safer area for neighboring existing residents. This would, in effect, reduce the distance existing residents would have to travel to a safer site, particularly during a late evacuation where a wildfire is encroaching upon the area's roads. The Rohde & Associates (2016) report is incorrect regarding its assumption that Dudek had not considered existing residents in its calculation of traffic (vehicles per hour). The study included the 60 existing residents and a conservative three cars per household, and the number of vehicles per hour was over 300 per hour fewer than the road is designed to flow.</p> <p>Response to Comment O1-30</p> <p>The comment on parking eliminating roadway obstructions is noted and it is agreed that the term "eliminate" should be changed to "minimizes" in FPP Section 5.2.1.2, <i>Measures Exceeding the Code</i>, item 2. The additional parking and third lanes into the Project are designed to minimize the likelihood that fire department access is slowed or prevented by illegally parked vehicles. This further applies to wildfire evacuations in that illegally parked vehicles can interfere with evacuations and slow emergency responder ingress into the Project. Providing numerous parking spots and wider roads with an additional lane to Harmony Grove Road facilitates emergency evacuation from the</p>

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	<p>Project area to the point where up to four evacuation routes are available (Harmony Grove Road and Country Club Drive intersection).</p>

COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter O1</p> <p>associated communities and is one of the most dangerous and complicated situations firefighters face.” (from “Preparing a Community Wildfire Protection Plan” by the National Association of State Foresters, among others). The HG WUI analysis was completed in 2015 (http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/hgvs/Harmony%20Grove%20Village%20South%20Public%20Review/PDS2015-GPA-15-002-WUIFERP_v3.pdf) and was based on only 735 homes and a population of 2,087. The HGV alone has 742 homes, there are about 100 original homes in Harmony Grove, and the Project will add another 453 homes, for a total of 1,300 homes, or nearly double the amount analyzed in the WUI. The nearby Valiano project, if approved, would add 380 homes to an existing 80 Eden Valley homes, all using the same evacuation route, Country Club Drive, for a grand total of 1,735 homes and a population of nearly 5,000. An updated WUI should be created that uses the anticipated number of homes and population at buildout of all the proposed communities to ensure that the area roads can safely accommodate this population during an evacuation.</p> <p style="text-align: right;">O1-32</p> <p style="text-align: center;">11</p>	<p>Please refer to response O1-33 for more discussion regarding how the Project’s design features influence evacuation traffic. Please also see Global Responses to Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment O1-31</p> <p>Please see the Global Response to Adequacy of Emergency Evacuation and Access. As described in more detail in that response, emergency evacuations are completed per direction from emergency personnel, who will decide when to evacuate, and when (as necessary and as a last point of refuge) it could be safer to remain on property rather than to leave. If there are many hours before a fire threatens the area, evacuation will occur and could include congestion, but there would be time to move all vehicles to urban areas in Escondido or elsewhere. However, if there were a short-notice evacuation scenario, that would be when fire and law enforcement personnel might make a decision to keep residents of HGV South (and HGV) in their well-protected, defensible homes. This would remove traffic from the roadways and leave them available to residents who do not have the ability to shelter in their homes during a wildfire. As necessary and directed, Harmony Grove community residents may be directed to shelter at the Center House or HGV. When time permits, animals are included within regional evacuation plans.</p> <p>Response to Comment O1-32</p> <p>The comment requesting that a new Wildland Urban Interface (SIC Wildland Urban Interface Plan or Community Wildfire Protection Plan) be prepared is noted. Updating these plans is recommended on at least a 5-year basis to account for changing conditions within the planning area. With conversion of fuel beds to ignition-resistant communities, priority hazard areas may change, evacuation options may be available that previously were not, and areas requiring additional focus may be identified. Please note that region-wide plans are not subject to individual development CEQA documents; these are greater planning efforts. As stated in the EIR (2017:3.1.3-14, 15):</p> <p style="text-align: center;"><i>The Unified San Diego County Emergency Services Organization has the primary responsibility for preparedness and response activities, and addresses disasters and emergency situations within the</i></p>

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	<p><i>unincorporated area of San Diego County. The County of San Diego Office of Emergency Services (OES) serves as staff to the Unified Disaster Council (UDC), the governing body of the Unified San Diego County Emergency Services Organization.</i></p> <p><i>Emergency response and preparedness plans include the Operational Area Emergency Response Plan and the San Diego County Multi-Jurisdictional Hazard Mitigation Plan. Both of these plans develop goals and objectives for OES in regards to large-scale natural or man-made disasters.</i></p> <p><i>The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan provides the framework for emergency response throughout the County, including at the Project site. It includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas.</i></p> <p>A representative of the HGV South Project would be a participant in the updating of the Harmony Grove Wildland-Urban Interface/Community Wildfire Protection Plan report to reflect changing conditions.</p>