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<td><strong>Response to Comment O6-1</strong>&lt;br&gt;These are introductory comments that identify the commenter. The comments are not at variance with the EIR and do not require a response.</td>
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<td><strong>Response to Comment O6-2</strong>&lt;br&gt;Comments noted. As a general policy comment, it is not an EIR-related issue that requires response. It is noted, however, that as stated in the County’s General Plan Update (2011) on page 1-15: &lt;br&gt;&lt;br&gt;<code>The General Plan is intended to be a dynamic document and must be periodically updated to respond to changing community needs. Any proposed amendment will be reviewed to ensure that the change is in the public interest and would not be detrimental to public health, safety and welfare.</code>,&lt;br&gt; Please also see the Global Response to Project Consistency with General Plan Policy LU-1.4 for a full discussion relevant to this issue.</td>
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<td><strong>Response to Comment O6-3</strong>&lt;br&gt;The comments regarding fires in Portugal are acknowledged. These comments do not address the environmental analysis or adequacy of the EIR and therefore a response is not required.</td>
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Response to Comment O6-4

The comments regarding evacuation current and post-Harmony Grove Village South (HGV South) Project evacuation conditions are noted. Exhibit A evacuation calculations (attached to your letter) have been reviewed. The Project’s Fire Protection Plan (FPP) discusses evacuations, the Project’s approach to minimizing evacuation impacts, and conducted evacuation traffic analysis under a worst-case condition in several sub-sections of EIR Section 5.2.1.2. Please also see the Global Response to Adequacy of Emergency Evacuation and Access.

Response to Comment O6-5

The comments regarding the General Plan Update process are noted; however, the comments do not address the environmental analysis or the adequacy of the EIR and therefore a response is not required. Relative to Project conformance with current planning policy, please see the Global Response to Project Consistency with General Plan Policy LU-1.4 for a full discussion relevant to this issue.
Response to Comment O6-6
Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. Please also see the Global Response to Project Consistency with General Plan Policy LU-1.4 for a full discussion relevant to this issue. The Project is not requesting an exception from the General Plan.

Response to Comment O6-7
The County Fire Authority and Rancho Santa Fe Fire Protection District (RSFFPD) have thoroughly reviewed and provided input to the Project’s Fire Protection Plan (FPP) and based on the fire protection designs and measures integrated into the Project, disagree that the Project presents a fire risk or would impede evacuations of existing communities. The inclusion of a quote from a former assistant fire chief from Colorado is noted; however, the comment does not address the adequacy of the EIR. Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.

The County disagrees with the comment that the Project is inconsistent with Policy LU-6.10. Policy LU-6.10 provides that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. The policy does not per se prohibit development in areas designated as a Very High Fire Hazard Severity Zone, as exemplified by the location of the Harmony Grove Village adjacent to the Project site. As explained in the Safety Element of the General Plan, because most of the unincorporated County is located within very high or extreme fire threat areas, avoiding high threat areas is not possible (General Plan Figure S-1 [Fire Threat]). Therefore, policies focus on minimizing the impact of wildfires through land use planning techniques and other mitigation measures (General Plan, Safety Element, page 7-5). As such, Policy LU-6.10 requires that development be located and designed to protect property and residents protected from risks such as fire. Development on the Project site has been located so as to provide substantial fuel management zones and minimize the risk of structural loss and life safety resulting from wildland fires consistent with Policy LU-6.10.
Response to Comment O6-8

Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.

The courts have consistently held that a project need not be a perfect match with each and every policy, but needs only to be consistent overall with the General Plan (Friends of Lagoon Valley v. City of Vacaville [2007] 154 Cal.App.4th 807, 817; see also Sequoyah Hills Homeowners Assn. v. City of Oakland [1993] 23 Cal.App.4th 704, 719, 29 Cal.Rptr.2d 182, where consistency is defined as “compatibility” and not strict adherence to every policy in the general plan). This means that the Project must be viewed in conjunction with the overall General Plan. Policies such as LU-6.10 and 6.11 would mean that development could be located on the Project site so as to minimize the risk of structural loss and life safety resulting from wildland fires and a project will not be developed where hazards cannot be mitigated. As explained in the Safety Element of the General Plan, because most of the unincorporated County is located within very high or extreme fire threat areas, avoiding high threat areas is not possible (General Plan Figure S-1 [Fire Threat]). Therefore, policies focus on minimizing the impact of wildfires through land use planning techniques and other mitigation measures. (General Plan, Safety Element, page 7-5.)

Response to Comment O6-9

Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.
Response to Comment O6-10

The Project meets the Fire Code requirements, and thus satisfies General Plan Policy S-3.5 Access Roads, by providing fire protection features that would not otherwise be required and that directly attenuate the potential for traffic congestion during evacuations. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.

Response to Comment O6-11

It is acknowledged that the Project is within a Very High Fire Hazard Severity Zone (VHFHSZ) and that fact is referenced in the Project's Fire Protection Plan (FPP; DUDEK 2016). Based on its location in a VHFHSZ, the Project did not ignore the potential fire threat. The Project analyzed and provided ignition resistant construction, access, water availability, fuel modification and construction materials and methods developed specifically to address and mitigate issues of developing within a VHFHSZ. The Project meets and exceeds these requirements. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.

Response to Comment O6-12

The comment regarding preparation of a regional worst-case evacuation scenario is noted. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.
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<td><strong>Response to Comment O6-13</strong>&lt;br&gt;As detailed in the Project’s FPP (Section 5.2.1.2, Access and Parking), it has been demonstrated that the Project’s proposed unit count and corresponding population can be safely evacuated from the area within a shorter time frame than four hours and has contingency options available should a wildfire ignite closer to the Project, reducing the time available for evacuation or compromising one or more of the four available evacuation routes. The comments regarding fires in Portugal are acknowledged. These comments do not address the environmental analysis or adequacy of the EIR and therefore an additional response is not required. Relative to evacuation of the larger valley, please see the Global Response to Adequacy of Emergency Evacuation and Access.</td>
<td><strong>RTC-O6-6</strong></td>
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Forecast Fire Propagation map (PDF52015-GPA-15-002-UFIFERP v3.pdf at 6) and (2) in the Double Peak/San Elijo Hills area cutting off egress access to San Elijo Road/Twin Oaks Valley Road, as could occur by arson and/or in a fire siege as occurred in 2014.

In this case, Country Club Drive would be the only safe egress as per the Wildfire Risk Analysis (14-15) for evacuating existing plus zoned potential plus cumulative project total of more than 2,500 homes based on a reasonable estimate of residences as well as humans and animal populations in the area derived from immediately available sources (i.e., combined existing and zoned potential residences in Elfin Forest, Harmony Grove, Eden Valley and Hidden Hills, existing and proposed residences in HGV, and proposed residences in the Valaine project and HGVs).

Using the FPP methodology which assumes a reasonable worst-case, each of the residences have three vehicles, and without accounting for additional relevant variables such as animal evacuation and evacuate prop time, there would be over 7,500 vehicles evacuating the area. Given the vehicular capacity of 1,500 on Country Club Drive between Mt. Whitney Road and Hill Valley Drive, as per the Highway Capacity Manual 2010, adapted to the conditions of Country Club Drive by WRO Engineers, it could take as long as four to six hours to evacuate all of the residents. This would constitute a significant impact that has not been disclosed, analyzed or evaluated in the DEIR.

A revised DEIR must include this analysis accounting for all automotive and horse trailer vehicle trips required to evacuate the human and animal population of the entire affected area under existing, existing plus zoned potential, and potential by GPA densities - a), b) and c) scenarios as defined above -- disclosing and analyzing all of the following factors in order to provide the public and decision-makers with enough information to disclose full potential impacts:

- Number of “legacy” currently existing homes in Harmony Grove, Eden Valley, Hidden Hills, and Elfin Forest, which may all be evacuating on the single route the WUI Emergency Evacuation Plan deemed to be safe, Country Club Drive;
- Potential number of residences in the same communities yet to be built per current zoning, so as to reasonably anticipate worst case scenario at build-out;
- Potential number of residences in the proposed GPA’s, Valaine and HGV;
- Number of large animals (horses, alpacas, cattle) and others unlikely to fit in a regular vehicle (goats, pigs, chicken and the like) to evacuate in the community of interest;
- Available on-site trailers or other means of evacuating such animals;
- Estimate of how many incoming trailers would need to be coming into those communities to retrieve those animals beyond the on-site trailer capacity;
- Estimate of how many emergency vehicles and apparatus might be using the same road.

Further, to provide a basis for evaluation of Project compliance with General Plan policies LU-6.30, S-1.1, S-2.6, S-3.5 and S-3.6, the analysis should account for the maximum time that Country Club Drive would be a safe mass evacuation route under the worst-case cited above, and determine the maximum safe residential density and population level in the affected area based on this evacuation time limit. For example, the map cited above from the DEIR shows fire reaching Country Club Drive north of the Proposed Project in four hours. Certainly, the maximum time window for mass egress would be no more than four hours and may be substantially less considering smoke and branding hazards and the risk of stranded motorists in the path of the fire as we just saw happening in Portugal on June 18th.
**Response to Comment O6-14**

Please see the Global Response to Adequacy of Emergency Evacuation and Access. Also, it should be noted that HGV South resident preparation time was included within the time estimates provided in the Project’s FPP. Exhibit A includes a comprehensive evaluation of build out of all the projects. It is not in conflict with Project analyses overall. The Project 2018 Evacuation Plan states that there are some fire scenarios where evacuation could require four hours or more.

**Response to Comment O6-15**

The County disagrees that the cumulative impact of HGV South to wildland fire hazards would be significant and that the EIR finding of insignificant is invalid. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. With respect to the requested survey, please see discussion under the heading “Speculative Simulations Regarding Various Evacuation Scenarios are not Required by CEQA” in Chapter 8.0, Section 8.3.4.4, of this FEIR.

Large animal evacuations are an integral component of the Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (EOP 2014). Department of Animal Services and the San Diego Humane Society are both participating agencies that during an emergency. Per the Evacuation Annex of this document:

The San Diego County Department of Animal Services (DAS) has plans in place to transport and shelter pets in a disaster under Annex O of the OA EOP, including the Animal Control Mutual Aid Agreement. Animal Control Officers, the San Diego Humane Society, and private animal care shelters will assist in the rescue, transport, and sheltering of small and large animals. In addition, potential volunteer resources and private groups should be identified and tracked in WebEOC. Only non-emergency resources and personnel, such as public and private animal services agencies, will be used to rescue and transport animals during an evacuation effort. In most

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<td><strong>Comment Letter O6</strong></td>
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Also, the time window should allow for evacuee preparation time. Using three hours for illustrative purposes as a maximum safe evacuation route time limit for mass egress, and 45 minutes evacuee preparation time, the approximate time to evacuate the human plus animal population based on reasonable residence and population estimates is as follows (based on the calculations from tables in Exhibit A).

- **Existing** = About 2½ hours, ½ hours less than the safe evacuation time limit
- **Existing + Zoned Potential** = Almost 5 hours, 2 hours more than the safe evacuation time limit
- **Existing + Zoned Potential + Potential by GPA** = About 6½ hours, 3½ hours more than the safe evacuation time limit

Clearly, whether based on the simpler analysis excluding prep time and animal evacuation data or the more detailed analysis inclusive of those variables, the cumulative impact of HGVW to wildland fire hazards would be significant, the DEIR finding of insignificant is invalid, and the Project design density is out of compliance with General Plan policies LU-6.10, S-1.1, S-2.6, S-3.5 and S-3.6.

The above analysis is based on the Fire Protection Plan vehicle volume methodology using a reasonable estimate of existing and potential residences, human and animal populations in the affected communities, and with the estimate of the maximum hourly vehicle capacity of County Club Drive between Mt. Whitney Road and Hill Valley Drive provided by MBO Engineers based on the Highway Capacity Manual, 2010 adapted to the conditions of County Club Drive.

In order to provide the basis for a more definitive analysis of the cumulative wildland fire evacuation hazards in the affected area for the general benefit of the community, planners and decision makers as well as to substantiate evaluation of Project impacts and compliance with General Plan policies LU-6.10, S-1.1, S-2.6, S-3.5 and S-3.6, the County should conduct a thorough survey of County records to determine the officially documented number and type of existing residences and zoned potential residences in Harmony Grove, Eden Valley, Hidden Hills and Elfin Forest, the affected communities that would rely on safe evacuation egress on County Club Drive to Auto Park Way under the worst-case scenario. The County should also conduct a survey of the existing and zoned potential animal population in each of these affected area communities, particularly horses and livestock, which are subject to evacuation and will add to the number of vehicles, i.e. horse trailers, both coming and going, to include in the evacuation time calculation. The animal population survey should include a survey of horses boarded by non-residents and the trucks and horse trailers of the boarders should be added to the number of inbound and outbound vehicles in the calculation. These data points combined with the number of residences, human and animal populations projected for the Harmony Grove Village Souths and Vakano projects will provide the County with a sound basis for calculation of the estimated cumulative time required for mass evacuation of the entire affected area under a reasonable worst case scenario using only County Club Drive to safety beyond the Auto Parkway Intersection.

The DEIR completely fails to disclose any of the data points cited above as the basis for sound decision making.
Short-timeframe wildfires may require an alternative approach and that approach requires animal owners in rural areas to plan for these events and create contingencies when evacuation may not be possible. This applies with or without development of larger communities.

A Wildfire Evacuation Plan has been prepared for implementation by the HOA prior to occupation of the site’s structures. The Wildfire Evacuation Plan includes easy-to-follow maps and instructions for residents to prepare their own “Ready, Set, Go!” action plans and preparing for pets and animals (FPP, page 37), although there will not be livestock allowed in the Project so there would be no additional animal trailers associated with the Project.

**Response to Comment O6-16**
The County disagrees with your comment that the EIR provides no basis for sound decision making. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access for discussion of the Project’s analysis, conclusions, and evacuation approach and determination of significance.
Response to Comment O6-17

The comment regarding additional calculations regarding evacuations is noted. However, the Project’s EIR and technical reports have been prepared to County and RSFFPD standards and meet the analysis requirements for determining whether significant impacts are associated with development of HGV South. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. With respect to the comment regarding HCM 2010 data, please refer to Response to Comment O3b-9, and addenda in the Final Traffic Impact Analysis.

Response to Comment O6-18

The comment regarding establishment of a community protection and evacuation plan (CPEP) or community wildfire protection plan (CWPP) is noted. While this comment does not address the adequacy of the EIR, the following response is provided. These emergency pre-planning documents are beneficial planning tools that can help assess and prioritize hazard areas for treatment, support applications for grant funding to implement hazard reduction, and provide basic recommended actions for before, during and following emergencies, including wildfires. These documents are typically coordinated by a non-profit organization, particularly, a Fire Safe Council (FSC). There are existing FSCs in Rancho Santa Fe and Escondido, and it would be recommended that Elfin Forest Harmony Grove Town Council contact the San Diego County Fire Safe Council (http://firesafesdcounty.org/fsc-support/start-a-local-fsc/) to inquire about setting up a community protection and evacuation plan (CPEP) or community wildfire protection plan (CWPP). The FSC then would be able to coordinate and reach out to collaborating agencies for preparation of one or both of the emergency planning documents mentioned. CPEPs and CWPPs are not used for Project-level impact and General Plan policy compliance analysis. These documents focus on existing conditions and how to reduce hazardous areas, plan for emergencies, and raise citizen awareness to appropriate responses to the types of hazards that exist in the vicinity of their homes.
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<td><strong>Response to Comment O6-19</strong></td>
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<td>The comment is noted. Please see Response to Comment O6-18 regarding preparation of CPEPs and CWPPs. Please see the Global Response to Adequacy of Emergency Evacuation and Access.</td>
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**Response to Comment O6-20**

The FPP does not “waive” the applicable dead-end road length code provision but rather was granted a modification, as allowed by the Fire Code. The FPP requires findings (site specific characteristics, provided fire safety features above and beyond the code, and measures directly meeting the intent of the code) to be made in order to receive a modification. The comment regarding secondary access being the only mitigation for dead end road length is incorrect. Please see the Global Responses to Fire Hazards Impact Analysis.

The feasibility of secondary access to the north, south, east and west of the Project site was analyzed with both County staff and RSFFPD input. However secondary access routes have proven infeasible based upon this evaluation (FPP Appendix C), which included an evaluation of eight alternatives for secondary access. Option 4, which would require improving a privately owned off-site road that connects with Johnston Road and eventually intersects with Citracado Parkway to the east of the HGV South Project, was determined to be the option with the least physical challenges. The FPP does not state that Johnston Road would be relied upon to evacuate residents during a wildfire emergency. The comment regarding Johnston Road’s current condition is noted. The condition of the road was evaluated by SDCFA, RSFFPD, the Project’s Fire Consultants, and independent fire pre-planning consultants for its potential to be used as secondary access. The result of that analysis indicated that even if access easements could be obtained, improvements to Johnston Road would result in a usable access way, but that would not strictly conform to the County’s roadway standards and a modification/variance would need to be granted.

**Response to Comment O6-21**

The comment presents conclusions from the Wildfire Risk Analysis (Rohde & Associates 2016) out of context and then utilizes them 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. In fact, the Rohde & Associates Report indicates that there are four potential evacuation routes north of Escondido Creek available for ingress/egress from the Project during evacuations. The conclusion of that report’s analysis was (see Page 15):

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|          | *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.*

Please also see the Global Response to Adequacy of Emergency Evacuation and Access.* |
The comment includes statements regarding shelter in place that are inaccurate, specifically that ignition resistant construction addresses embers only. The structures in the community have been designed to ignition resistance levels necessary for the worst-case fire scenario given the site’s fuels, terrain, and extreme weather conditions. Please see the Global Responses to Adequacy of Emergency Evacuation and Access.

Further, development in the area is converting much of the valley bottom fuels to ignition resistant landscapes. Fire through the valley bottom would be spotty and with an inconsistent fire front. The primary fire front will be on the slopes of valley bordering hills, where native fuels are concentrated. The Project’s developed areas are on the valley bottom with developed landscapes and reduced fuels to the north and northwest. The comment’s supposition that a fire front will result in 2,000-degree heat on the Project’s structures is not supported by fire science or actual fire event after action assessments. Further, to clarify, there is no expectation in the FPP or its fire protection system that residents of HGV South will be involved with fire-fighting.

This type of development with an unbroken landscape (as opposed to low density wildland urban intermix projects) has been found to perform well against wildfires (USGS Research 2015; IBHS Mega Fires 2008, both incorporated by reference). Fire behavior has been analyzed, compared to similar fire environments, and accepted by County Fire Authority.

While wildfires under extreme wind conditions can be unpredictable, the Project has been designed with a layered system of protections and determined to include the necessary features to perform well during wildfires.

The quotations regarding anthropogenic fire increases in the comment are based on theoretical models that are limited in their ability to predict and include assumptions, some very important, that relegate the study’s conclusion
invalid for comparison with HGV South. For example, the referenced study (Mann ML, et al. 2016, incorporated by reference) quote: “In areas with a low adjacent housing density, the likelihood of fires increases rapidly with additional density (i.e., increased ignitions)” neglects to include the second half of that sentence, which reads: “but then decreases beyond some point as characteristics of the built urban environment and increased suppression effort reduce it.” The study acknowledges that development of areas (even development that is not as fire hardened as HGV South) will reduce the number of fires, dramatically, following initial development. The study is flawed with regard to comparison with HGV South in that it does not consider the fire ignition mitigating effects of fuel treatments, i.e., fuel modification zones, as stated in the Assumptions and Limitations section: “Additionally, we do not include the effects of fuel treatment, which have been shown to be effective in some ecosystems.” This is a significant study limitation that renders the study’s conclusions inapplicable to the HGV South Project.

The second quote regarding lower housing density and larger numbers of small isolated clusters of development including the highest predicted fire risk to the largest population (Syphard and Keeley 2013, incorporated by reference) is not an appropriate example for the HGV South Project or Harmony Grove. HGV South is a continuous area that is fuel converted and fire hardened. Harmony Grove Village is also a large (larger than HGV South) area that is fuel converted and fire hardened. Existing developed properties along Country Club Drive include a high level of fuel conversion. This has a direct effect on the wildfire spread, intensity, and behavior.

The Project will include a robust fire protection system, as detailed in the Project’s FPP. This same robust fire protection system provides protections from on-site fire spreading to off-site vegetation. Accidental fires within the landscape or structures in the Project will have limited ability to spread. The landscape throughout the Project and on its perimeter will be highly maintained and much of it irrigated, which further reduces its ignition potential. Structures will be highly ignition resistant on the exterior and the interiors will be protected with automatic sprinkler systems, which have a very high success rate for confining fires or extinguishing them. The HGV South community will
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| be a fire-adapted community with a strong resident outreach program that raises fire awareness among its residents. | **Response to Comment O6-24**
The County disagrees with the comment that the Project decreases the ability for existing residents to evacuate due to increased road congestion. Please see the Global Response to Adequacy of Emergency Evacuation and Access. |
| | **Response to Comment O6-25**
Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. |
| | **Response to Comment O6-26**
It is agreed that secondary access is important and that if all access routes are congested, emergency management personnel may decide it could be safer to stay in the home. Please see the Global Response to Adequacy of Emergency Evacuation and Access. |
Response to Comment O6-27

Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.

Response to Comment O6-28

Please see the Global Response to Adequacy of Emergency Evacuation and Access.

Specifically, regarding citizen reaction during wildfires, research indicates orderly movement/direction of people is the result of planning, training, education, and awareness, all of which are promoted to varying degrees within San Diego County. Evacuation has been the standard term used for emergency movement of people and implies imminent or threatening danger. The term in this response, and under the “Ready, Set, Go!” concept that will be employed at HGV South, indicates that if there is a perceived threat to persons and movement out of the area is necessary, it will occur according to a pre-planned and practiced protocol, reducing the potential for panic.

Citizen reactions may vary during an evacuation event, although several studies indicate that orderly movement during wildfire and other emergencies is not typically unmanageable. Evacuation and the contingency on-site sheltering can be made even less problematic through diligent public education, which will occur at HGV South, and emergency personnel training and familiarity, which occurs at the County and city levels in San Diego County. The Wildfire Evacuation Plan, discussed in Response to Comment O6-15, will be located at the HOA as well as given to homeowners. In addition, there will be yearly meetings with RSFFPD personnel that homeowners will be encouraged to attend. HGV South residents will be aware of the potential fire threat in the area, and of the preferred approach to evacuate early, well before a fire threatens the community. They will also be aware of their community’s ability to provide a contingency option of temporarily sheltering in their homes. Social science research literature indicates that reactions to warnings follow certain behavior patterns that are defined by people’s perceptions (Aguirre 1994, Drabek 1991, Fitzpatrick and Mileti 1994, Gordon 2006, Collins 2004, all incorporated by reference) and are not unpredictable.

RTC-O6-16
In summary, warnings received from credible sources by people who are aware (or have been made aware) of the potential risk, have the effect of an orderly decision process that typically results in successful evacuation. This success is heightened when evacuations are practiced (Quarentelli and Dynes 1977, Lindell and Perry 2004, incorporated by reference) as is recommended within the Harmony Grove area for both the populations in higher hazard areas and for fire and law enforcement personnel. Further, in all but the rarest circumstances, evacuees will be receiving information, including their direction for residents to stay in their homes, from credible sources during a wildfire evacuation. Further, it would be anticipated that law enforcement and/or fire personnel would be on site to help direct residents, calm them, and provide updates and would be viewed by evacuees as knowledgeable and credible. Education and training regarding fire safety and evacuation events is an element of successful future evacuations.

Lastly, the club house is not intended to house all of the HGV South’s residents. Each of the buildings on site has the ability to be used for temporary sheltering, if directed to do so. The clubhouse can be used for moving some of the site’s population from perimeter areas, if considered necessary. It can also be used as a staging area for fire operations and can be available to existing residents on Country Club Drive if that is considered the best option for their relocation.

Response to Comment O6-29
Contrary to the supposition in the comment, the payment to the HGV Fire Station is not being provided in exchange for an exemption from the Fire Code. Project fire standards are expected to exceed Code requirements. Rather, the payment would support adequate fire services for the Project (and, it is assumed, surrounding neighbors). The contribution to the HGV Fire Station is a routine part of development fees, similar to those paid to support police services and schools.

As indicated through all the responses above, the Project has been analyzed by the County and RSFFPD on the merits of the proposed plan and the measures provided to mitigate the potential fire risk. The Project was not found to make fire more likely, or to result in adverse effects on evacuation. To the contrary, the presence of a fire-resistant development would be likely to shield some uses...
 currently providing the development/wildland interface, and would also facilitate easier evacuation for all existing residences currently using the two-lane portion of Country Club Drive south of Escondido Creek and the narrow at-grade crossing.

**Response to Comment O6-30**
Please see the Global Responses to Project Consistency with General Plan Policy LU-1.4 and to General Plan/Community Plan Amendments CEQA Impact Analysis.
**Response to Comment O6-31**

The baseline count of 220 was derived from the General Plan Land Use designation for the property (0.5-acre lots) which yields a gross number of 220. The staff yield estimate from the comment is a Property Specific Request presented as part of the process for establishing the General Plan and not applicable to the Project.

**Response to Comment O6-32**

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 discussion of land use compatibility.
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response to Comment O6-33</strong>&lt;br&gt;The alternative (presented in Letter O3a) has been reviewed, as requested. Please see Response to Comment O3a-50 for a discussion of the Harmony Commons Alternative.</td>
<td></td>
</tr>
<tr>
<td><strong>Response to Comment O6-34</strong>&lt;br&gt;The County acknowledges the conclusion comments, but disagrees that recirculation of the EIR is required based on issues of safety or land use. Please refer to responses to the individual comments above for rationale as to why Project analyses are adequate and appropriate. Comments provided in 2011, prior to initiation of this Project, are not germane to Project analyses.</td>
<td></td>
</tr>
<tr>
<td><strong>Response to Comment O6-35</strong>&lt;br&gt;A series of supporting documents are referenced in the comments in this letter. Each was reviewed prior to authoring the responses to comments in Letter O6. The notes below summarize the type of documents and location in the responses where related discussion is provided.</td>
<td></td>
</tr>
<tr>
<td>Exhibit A: This exhibit includes an evaluation of build out the area in terms of evacuation during a wildfire. This is exhibit is consistent with the 2018 Evacuation Plan which states that there are some fire scenarios where evacuation could require four hours or more. The Evacuation Plan and Evacuation modeling is addressed in Response to Comment O6-14.</td>
<td></td>
</tr>
<tr>
<td>Exhibit B: This exhibit consists of a 2010 Staff Report submitted on the Property Specific Request (PSR) for a different project, Harmony Grove Meadows. Nonetheless, this issue is addressed in Response to Comment O6-31.</td>
<td></td>
</tr>
<tr>
<td>Exhibit C: This exhibit consists of the 2007 Scoping Letter submitted for a different project, Harmony Grove Meadows. The exhibit is part of the public record and does not require further response.</td>
<td></td>
</tr>
<tr>
<td>Dropbox:&lt;br&gt;- A complete response to the Harmony Grove Alternative is included in Responses to Comments O6-33 and O3a-50.</td>
<td></td>
</tr>
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| **•** This exhibit consists of a 2010 Staff Report submitted on the Property Specific Request (PSR) for a different project, Harmony Grove Meadows. Nonetheless, this issue is addressed in Response to Comment O6-31.  
**•** This exhibit consists of the 2007 Scoping Letter submitted for a different project, Harmony Grove Meadows. The exhibit is part of the public record and does not require further response.  
**•** This exhibit consists of the 2011 EFHGTC letter, submitted for a different project, Harmony Grove Meadows, and does not require further response.  
**•** This exhibit is the County staff powerpoint on a different project, Harmony Grove Village (HGV), and is not applicable to the proposed project.  
**Response to Comment O6-36**  
The County appreciates the resubmittal of Ms. Arsivaud’s comments from June 20, 2017. This spreadsheet was not listed in the list of exhibits and drop box attachments to the letter, and the spreadsheet became separated from the letter. The comments are fully responded to below, have been provided to the commenter, and have been included prior to Project consideration by the decision makers. The responses document the finding that no issues were raised that resulted in identification of new significant impacts. |
Response to Comment O6-36 – Fire Protection

FP-1 Johnston Road Exit
Availability of Alternative Evacuation Route. The existing access for 3 to 4 residences crosses the HGVS site (Appendix E). Access for these residences will continue to be provided through the HGVS site after development, but via improved, code conforming roadways. The existing road does not meet the fire code, varying in width, surface, and grade. However, this road is accessible by typical passenger vehicles and does connect with Johnston Road to the east. Therefore, even though the road does not provide code-conforming secondary access, it would be available in an emergency situation that required moving people to the east and the primary access route (Country Club Drive) was not available. The comment suggests crossing private property in order to provide the applicant's up to 1500 residents emergency egress via an improved, unpaved path unsuitable for emergency equipment and anything other than a four wheel drive vehicle. The very notion that the applicant is suggesting this extreme case of violation of existing residents' property rights shows several things: a) the applicant is clearly concerned about entrapment (and loss of life) during the very likely scenario that exists via Country Club Drive is not possible due to fire or other blockage b) that they have no real concrete plan to prevent loss of life in this scenario c) they have very little knowledge of the area that they are proposing a makeshift (and likely illegal) secondary egress as it is clearly a difficult terrain surrounded by highly volatile vegetation. This statement is to be stricken from the document as insecure, and legally questionable since the property owners who own the private roadway have not been contacted and will not be granting an easement through their property. Furthermore, there is no guarantee that the road is passable now nor in the near future.  

FP-2 Johnston Road access improved
Access for these residences will continue to be provided through the HGVS site after development, but via improved, code conforming roadways. The existing road does not meet the fire code, varying in width, surface, and grade. The second route would require improving a privately owned road that connects with Johnston Road and eventually intersects with Citracado Parkway to the east of the HGVS Project. However, extensive analysis has determined that both of these secondary access routes are infeasible. Due to extremely steep terrain, environmental and biological habitat issues, and privately held property where easements cannot be obtained, there is not a secondary access road solution that can meet the strict definition of the code. The comment that access would be improved and that is addressed in this quote refers to the on-site portion of the roads ("access...will continue to be provided through the project site") – but this access would be upgraded from unpaved dirt roads to improved paved roads within HGVS South Project boundaries.  

FP-3 Secondary access contractio n
On page 32, the FPP clearly states that there is no secondary access solution. But then on P.33, it states that emergency egress could be provided via the private easement. These are in direct contradiction to each other. The comment is not understood. Page 33 does not say that emergency egress could be provided via the private easement. Page 33 addresses Project elements that render egress equivalent to secondary access under the Code.  

FP-4 HGVS as extension to HDV
This is incorrect. HDV is a village centered development with higher density at its village core which features out to large lots on the periphery as part of the plan to integrate an urbanized community into a rural area with as little disruption of the rural environment as possible. HGVS ends north of Harmony Grove Road. HGVS is not adjacent nor connected in any way to HGV, therefore it is not an "extension of HGV" This statement is also irrelevant to the discussion about secondary access. HDV South would comprise an extension of the existing HGV if approved. Please refer to Global Response: Project Consistency with General Plan Policy LU 1.4 and the USP: HGVS Project Plan, Section 1.3.3. Please also note that HGV does not end north of Harmony Grove Road. The HGV Planning Area 4 (the future Equestrian Ranch) is directly across Country Club Drive from the Project.  

FP-5 HGV as Firebreak
Please refer to Global Response: Fire Hazards Impact Analysis, the Project FPP, and the Project EIR. Please note that the FPP does not attempt to connect the Project with HGV. The Project EIR identifies the 20+ homes "immediately adjacent to the project" as being "connected in any way to HGV" which addresses the Project elements contributing to the fire-resistant nature of the Project, as well as why Project elements would contribute to breaking fire paths from the south or east. The orientation of theCoca Fire, and the fact that fire can take hold in areas of native vegetation, are not in conflict with technical data in the FPP or EIR; The 20+ homes listed "immediately adjacent to the Project" is assumed to be a reference to the residents in the Harmony Grove Spiritualist Association, which is approximately 0.25 mile to the west of the site. This unfortunate burn took place in a community with grandfathered (in historical) in nature land uses, built without current requirements for structures, landscaping, etc. The Project is not equivalent.  

FP-6 Shelter in Place definition
The FPP also states that the proposed project has a shelter-in-place “philosophy” (but not official status) so that its residents would be safe during a wildfire event. SIP design features are designed to eliminate ignition sources in the landscaping and hardened construction materials to protect from ignition by smart embers. It does not make the houses impervious to the fire front itself. Stated adjacent to a wildland urban interface (WUI) with permanent open space, brush and chaparral surrounding the project an even at least 2 sides, the houses of HOVS are more likely to be overwhelmed by the fire front itself, not just the embers from said fire. The close spacing of the units makes this more likely to happen and in fact there is no evidence that SIP will protect houses in high fire density developments; in fact it was designed for rural and semi-rural density areas. The FPP Summary of Findings and Mitigation for this Project, p. 34, point 6. Please refer to Global Response: Fire Hazards Impact Analysis, the Project FPP and the Project EIR (Section 3.1.3. Hazards and Hazardous Materials) each of which addresses components of the ability for decision makers to direct residents to temporarily shelter on site, within the community. Because the Project includes site-wide fuel modification zones (FMZs), including on the perimeter, and the fire environment adjacent to the Project includes features that typically move fire away from the valley floor (slopes up and away from the project) and large areas of disturbed, converted or righted fuels, the potential for a fire front to cause extreme heat on any of the structures is extremely low. Heat from a fire dissipates quickly over distance, which is why custom PMZs are provided and considered by all reviewing.
FP-7

Shelter in place provides for the likelihood that safe evacuation may NOT be possible, but ignores the risk that it places on the existing community.

HOVIS Shelter in Place Philosophy (Not Status). The project will incorporate the same fire protection philosophies as Rancho Santa Fe’s shelter in place communities, but will not seek shelter in place status. HOVIS, like most new communities in San Diego County, will offer the last resort option of temporarily seeking refuge on site if early, safe evacuation is not possible.

FPP Summary of Findings and Mitigation for this Project, p.34, point 6

The FPP states that it is a “last resort” option if “safe evacuation is not possible.” If SIP building practices were to offer the sorts of protections against wildfires they are suggesting (which is questionable given that SIP can protect from ember combustion but not fire front damage and was not designed to protect high density housing), they are raising the prospect that most of our residents fear the most: the inability to evacuate due to blocked roads, fire paths, or congestion. Due to lack of secondary egress, the only recourse is to stay put in hardened buildings. THE PROBLEM with this assumption is that it throws the existing residents under the bus and leaves them trapped behind an encroaching fireline in homes that are not shelter-in-place. Please revise the DEIR to reflect the risks existing home owners are facing due to lack of secondary access and homes that are not hardened to SIP standards. Please include mitigation that will cover a retrofit of all the existing houses in the area with new roofs, new siding, new drywall, sealed eaves, gutters, installation of interior sprinklers, fire safe landscaping and to meet identical SIP “philosophy” standards proposed with the project.

FP-8

Shelter in place will not reduce the evacuation volume to make it efficient and safe.

HOVIS Shelter in Place Philosophy (Not Status). The project will incorporate the same fire protection philosophies as Rancho Santa Fe’s shelter in place communities, but will not seek shelter in place status. HOVIS, like most new communities in San Diego County, will offer the last resort option of temporarily seeking refuge on site if early, safe evacuation is not possible.

FPP Summary of Findings and Mitigation for this Project, p.34, point 6

Importantly, listing SIP as a “mitigation” is meant to obfuscate and misleadingly lead the reader to believe that will compensate for residents’ inability to evacuate due to the lack of secondary egress. It is proven that most SIP residents choose to evacuate rather than stay behind, so therefore evacuation traffic will not be reduced (“Farrer than half of the [decidedly well informed and affluent] residents interviewed indicated they would actually stay in their homes during a fire event.” according to International Journal of Wildland Fire study. “Adoption and perception of shelter-in-place in California’s Rancho Santa Fe Fire Protection District”)

The Project’s ability to serve as temporary refuge if fire emergency personnel so require does not relate to lack of secondary access. The Project design features overall, including provision of three lanes on Country Club Drive and improvement of the Escondido Creek Crossing from a narrow two-lane at-grade crossing to a bridge crossing, contribute to features resulting in Project design being equivalent to provision of secondary access under the Code. An equivalent level of safety is being provided through an alternative method, as allowed in the code, as documented in the Project FPP and EIR, and as approved by both County and RSFFPD personnel.

FP-9

Shelter in place standards are much more strict than what is proposed by applicant.

HOVIS Shelter in Place Philosophy (Not Status). The project will incorporate the same fire protection philosophies as Rancho Santa Fe’s shelter in place communities, but will not seek shelter in place status. HOVIS, like most new communities in San Diego County, will offer the last resort option of temporarily seeking refuge on site if early, safe evacuation is not possible.

FPP Summary of Findings and Mitigation for this Project, p.34, point 6

Even our own Fire District states that secondary access in SIP communities is crucial: “It is important to have more than one way out of your community, including secondary access routes. If all routes are congested, you would be safer in your home than being stuck in traffic trying to evacuate.” (https://www.sfdfire.org/wp-content/uploads/2016/09/SIP_for_web.pdf).

The comment is noted. The RSFFPDO has concluded that the proposed modification to the dead-end road length standard is allowable on the HGVS South project site based on its unique site features; including the short distance from the Project’s entrance to the intersection with Country Club Drive and Harmony Grove Road, at which point, one can travel on several available routes.

FP-10

Significant potential exists for civilian entrapment and SIP will only protect new residents.

Consultant staff and public safety officials reviewing the site agree that the significant potential exists for civilian entrapment within the tract during extreme fire behavior conditions if certain fuels management and structural hardening against wildfire is not incorporated into the planned development.

Rohdes, HGVS Wildfire Risk Analysis study, p.17, point 9

Here the developer’s OWN studies show that there is SIGNIFICANT potential for civilian entrapment to occur. The mitigation against this entrapment is fire-hardened residences along the WUI. Please explain how EXISTING rural residents will be protected by the HGVS Shelter in Place Philosophy (Not Status). The finding that the modification would not “lessen health, life and fire safety standards” was explicitly made by fire officials with jurisdiction.

The purpose of the FPP (a project-specific document) is to assess impacts to future Project residents. It is not intended to address regional issues. Regional access and egress are addressed in regional plans. Please see the Global Responses: Fire Impact Hazards and Adequacy of Emergency Evacuation and Access regarding roadways, existing and planned growth, etc.

FP-11

Shelter in Place philosophy is inadequate mitigation for no secondary access, and waiving the dead end.

HOVIS Shelter in Place Philosophy (Not Status). The project will incorporate the same fire protection philosophies as Rancho Santa Fe’s shelter in place communities, but will not seek shelter in place status. HOVIS, like most new communities in San Diego County, will offer the last resort option of temporarily seeking refuge on site if early, safe evacuation is not possible.

FPP Summary of Findings and Mitigation for this Project, p.34, point 6

So the waiver is the key California Fire Code requirements puts existing residents (and the new ones as well) at considerable risk and increases their likelihood of property damage and risk to the personal safety. This is in violation of the County of San Diego Guidelines for Determining Significance in Wildland Fire and Fire Protection regarding modifying requirements: 1) That the modification is in compliance with the intent and purpose of the code; 2) A map showing the proposed location of the mitigation/exception measures and 3) That such modification does not lessen health, life and fire safety standards. Source: http://www.sandiegocounty.gov/dps/docs/Fire-Guidelines.pdf

Please substantiate any claims that the FPP does not put existing residents at risk and also provide studies showing how SIP will mitigate any risk to both existing or new residents not just due to ember ignition but also direct fire front damage or as was the case with recent fires in the County, as is likely due to the proximity and abundance of open agencies and the acceptance agency, Rancho Santa Fe Fire Protection District (RSFFPDO), to provide adequate setback and protection from potential heat generated from off-site fuels.
road length

Dead end road that leads to the most distant structure on HGVS measures approximately 0.8 miles to the intersection of Harmony Grove and Country Club.

The dead-end road that leads to the most distant road on HGVS measures approximately 0.8 miles to the intersection of Harmon Grove and Country Club.

The HGVS project will provide fair-share funding through assessments, taxes, etc., which will help to close the financial gap that currently exists.

Mitigation for this Project

Mitigation for this Project

summary of findings and mitigation for this project p.33, point 2

The statement regarding Country Club Drive north of the bridge over Escondido Creek is incorrect. The Project would improve this road all the way to the intersection with Harmony Grove Road. North of the intersection, Country Club Drive is paved to three lanes wide north to the vicinity of Mt. Whitney Road (north of Howard), and has right-of-way varying width north of there, although only two lanes are paved. The Rogers study was commissioned by the County and is not an Applicant-funded study. Country Club Drive is also not the only evacuation route north of the creek, it is possible to go east or west on Harmony Grove Road, and even after having committed to continuing north on Country Club Drive, there is potential to travel east at Harmony Grove Parkway or Kansana Loop Drive.

Evacuation: HG Road and Country Club Drive

Evacuation: HG Road and Country Club Drive

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Evacuation: HG Road and Country Club Drive

The applicant is measuring the dead-end road from the HG Road and Country Club Drive entrance of the structure on HGVS measures approximately 0.8 miles to the intersection of Harmony Grove and Country Club.

This is misleading and irrelevant to evacuation capacity. Only a short portion of Country Club Drive (about 1400 feet) is being widened. Once it crosses the bridge, Country Club Drive funnels down to 2 lanes prior to crossing HG Road where it continues as a two-lane road 2.3 miles before it reaches the signal at Auto Club Way. This, according to the applicant's own study (Rohdes), is the ONLY viable evacuation route. It should be noted that this is a LOS F road, (using correct circulation data (see comment 3 under traffic)

The statement regarding Country Club Drive north of the bridge over Escondido Creek is incorrect. The Project would improve this road all the way to the intersection with Harmony Grove Road. North of the intersection, Country Club Drive is paved to three lanes wide north to the vicinity of Mt. Whitney Road (north of Howard), and has right-of-way varying width north of there, although only two lanes are paved. The Rogers study was commissioned by the County and is not an Applicant-funded study. Country Club Drive is also not the only evacuation route north of the creek, it is possible to go east or west on Harmony Grove Road, and even after having committed to continuing north on Country Club Drive, there is potential to travel east at Harmony Grove Parkway or Kansana Loop Drive.

The Road to the southernmost HGVS project entrance to Grove Village Parkway. Thus, that intersection could not be shutdown during an evacuation as traffic controls would have to be in place to keep those two traffic streams from colliding. Thus the time to exit from those routes would be impeded by the traffic control (traffic control is a stop light, at least until law enforcement is deployed to control the intersection). It should also be studied as to what would occur if an accident occurred at that intersection during the evacuation as this could potentially close that route of escape. This all lends proof that the only true safe and prudent exit would be Country Club Drive. However, CCD would not be able to handle that traffic flow and would likely result in entrapment of those evacuating.

The HGVS project will provide fair-share funding through assessments, taxes, etc., which will help to close the financial gap that currently exists.

The dead-end road that leads to the most distant road on HGVS measures approximately 0.8 miles to the intersection of Harmony Grove and Country Club.

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Since 60 legacy homes located to the south and west of the proposed development have no Safety Zones in the vicinity of their residences, and Country Club Dr. also provides access for these residents, it is likely these residents will use the same evacuation routes and Safety Zones identified for use by Harmony Grove Village South, and will view the proposed development site itself as an opportunity for safe refuge.

The Road to the southernmost HGVS project entrance to Grove Village Parkway. Thus, that intersection could not be shutdown during an evacuation as traffic controls would have to be in place to keep those two traffic streams from colliding. Thus the time to exit from those routes would be impeded by the traffic control (traffic control is a stop light, at least until law enforcement is deployed to control the intersection). It should also be studied as to what would occur if an accident occurred at that intersection during the evacuation as this could potentially close that route of escape. This all lends proof that the only true safe and prudent exit would be Country Club Drive. However, CCD would not be able to handle that traffic flow and would likely result in entrapment of those evacuating.

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The HGVS project will provide fair-share funding through assessments, taxes, etc., which will help to close the financial gap that currently exists.
FP-17  
Baseline calculations for evacuation scenarios  
Population and structures at risk: structures - 735 homes, for 2,087 residents, or an average of 2.84 per home.  
p.2  
There are a number of major issues with the assumptions as presented, starting with the number of structures at 735. Juul-Harmony Grove Village is approved for 742 homes, plus we have 80 existing homes in Eden Valley, and about 150 in the rest of Harmony Grove. In addition to that, the model should be adding the 453 proposed units of Harmony Grove Village South, at a minimum, since the study is about that project, and 380 units of proposed Vallano (326 plus 54 Secondary Dwelling Units), for a total closer to 1,800 homes. Using the same 2.84 ratio utilized by Rohde and Associates, that would be 5,112 people trying to evacuate. What is the basis for the 735 number?  
The model referred to is not a model, per se. The evacuation plan is a Project-specific analysis of evacuation intended to raise the awareness of HGV South residents of the options available to them. It does include a simple calculation that is sourced from the County's Emergency Operations Plan, Evacuation Annex. The formula only evaluates the amount of time estimated to evacuate the Project. There is no requirement by CEQA or any other policy or regulation to analyze or model evacuations on a project, neighborhood, or regional level, and the number of residents assumed was based on County assumptions relative to this particular issue in order to keep this study consistent with other County evaluations.

FP-18  
Using Country Club Drive as evacuation  
Under "primary evacuation plan", the report states "Move North Via Country Club Drive as the primary route"  
P.2  
Given this is a two-lane road which cannot be widened, nor is currently scheduled to be widened anytime in the future, does the model show that over 5,000 people will be able to evacuate along that stretch? How many horse trailers were assumed? How many incoming trailers to get horses and other livestock? Further, the traffic on Country Club Drive is further compromised at the intersection with Nordahl, which gets backed up even in daily commute situation because of the train tracks crossing which back up the traffic on Nordahl past Country Club Drive. Even if trains are stopped, traffic on Nordahl going towards 75 will create a bottleneck at the intersection with Country Club Drive. Note that Vallano DEIR expects CCD will operate at LOS F without evacuation situation.  
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. Neither of these plans provides specifics as to evacuation routes in any given fire as the circumstances of each emergency will vary. The Project would not implement any of the Operational Area Emergency Plan or the Multi-Jurisdictional Hazard Mitigation Plan or interfere with evacuation activities conducted in accordance with these documents. The primary requirements of an evacuation plan are to identify evacuation routes and to prepare residents for an emergency event. It is a key document for Incident Command when an emergency event occurs in the area. The evacuation plan prepared by the Project Applicant is a Project-specific plan intended to raise homeowner awareness. HGV South residents would not be allowed to house horses on site. As such, horse trailers are not included in evacuation projections. As indicated in the County's evacuation annex (Annex F of the Emergency Response Plan) animal owners are responsible for evacuation of their animals. Although emergency personnel will attempt to accommodate non-human evacuation, and historically participate in routing such vehicles to safer staging areas, emergency calculations are focused on human life and safety. Please note that cumulative peak hour LOS assessments do not pertain to emergency conditions, when routine road sharing is over-ridden by emergency personnel directions and lanes may be opened for additional travel under such circumstances. It is not possible, however, to design every roadway to accommodate full width for a free-flowing emergency evacuation scenario. Congestion should be assumed. Agencies coordinate during evacuations and law enforcement personnel control key intersections to move traffic on a priority basis. This method has been successful during numerous large evacuation events over the last 15 years.

FP-19  
Identification of fire agency having jurisdiction (FAHJ)  
"currently SDCFA"  
Public Services section  
3.1.5-1  
In other sections of DEIR, FAHJ is identified as RSF Fire district - should be consistent throughout all documents  
The comment is correct that DEIR Section 3.1.9 retained an earlier statement that the County was the FAHJ at the time it was written. The next sentence, however, noted that the RSFFPD would serve the Project if approved, and referred the reader to Section 3.1.3 of the EIR, which provided additional detail on fire service and discussed RSFFPD as the new FAHJ. No substantive misunderstanding would result. Nonetheless, this statement has been corrected in the FEIR.

FP-20  
Document referenced missing  
The lot has been transferred to the County and a request for design-build services for the permanent station was led in March 2017 (Huff, 2017: pers comm.)  
Public Services section  
3.1.5-2  
Please provide details and actual document to support assertion  
The HGV fire was approved for construction as part of the HGV project. A temporary Harmony Grove Fire Station is currently operational immediately south of Harmony Grove Village Parkway and the permanent station should be operational by March 2019. This information was provided through a personal communication (phone call) with Mr. Huff following coordination with the RSFFPD. An additional reference has been added to Chapter 5 of the EIR.

FP-21  
Impact not discussed  
The discussion below focuses on the issue of fire department response time only  
Public Services section  
3.1.9-6  
Impact of impairment to evacuation of current residents should be discussed, as well as impact on ability to evacuate for all residents outside the Project, including future residents of HGV.  
The requested analysis is not a required CEQA analysis. Evacuations are managed by trained law enforcement and emergency responders with a proven track record in San Diego County of successful evacuations.

FP-22  
Potential conflict of interest to  
"if not improving them in this area of the County where there is a known gap". The approved fire station that would be built in HGV requires additional funding to  
Public Services section  
3.1.9-9  
Applicant stated to both TECC board and EPHCCT Board that the County Fire Authority had asked for an increase in units to generate enough dollars to close this gap, the result of poor decisions made by SDCFA in the approval of HGV. Now as FAHJ the Please refer to the response to Fire Protection item 12 of this matrix.
<table>
<thead>
<tr>
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<td></td>
<td>approve Project to fill a &quot;known gap&quot; in County finances</td>
<td>cover annual operating costs. The HGV South Project would provide fair-share funding to help close the financial gap that currently exists.</td>
<td></td>
<td></td>
<td>SDCEFA is approving exceptions to the Fire Code for secondary exit and maximum dead end length, which will result in endangering the safety of residents outside the Project. Please discuss and disclose the exact nature of the &quot;gap&quot; referred to, the amount projected on a yearly basis for the next 30 years or if the amortization period for the fire station is longer, for the duration the &quot;gap&quot; will appear in County financial statements. Please show the gap with this project and without, so the public can fully measure the nature of the incentive that may have existed to grant exceptions in order to remedy the financial gap created by the FAHJ by its actions on another project.</td>
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Response to Comment O6-36– Hazards

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<tbody>
<tr>
<td>H-1</td>
<td>Project description is not adjacent to HOV</td>
<td>This site listed as “Harmony Village Grove” in the updated HOV’s site review is located on the portion of the HOV project north of Harmony Grove Road, and is approximately 375 feet northwest of the Project site at its closest point.</td>
<td>Hazards 3.1.4-5</td>
<td>This clearly states that the Project is NOT adjacent to HOV, as claimed elsewhere in the DEIR to try to convince readers it can qualify as a village extension.</td>
<td>The Project is contiguous/adjacent to HOV. This text is pontificating a physical location, which is sited within the existing HOV development footprint. The phrasing indicates that the hazardous materials site is not close enough to developable portions of HOV's South to constitute an issue of concern.</td>
</tr>
<tr>
<td>H-2</td>
<td>Identification of FAHJ inconsistent throughout document</td>
<td>The Rancho Santa Fe Fire Protection District (RSFFPD) is the Fire Authority Having Jurisdiction (FAHJ).</td>
<td>Hazards 3.1.4-7</td>
<td>Elsewhere in DEIR SOCAFA is listed as FAHJ - confusing to reader and possibly misleading. Correct throughout for consistency.</td>
<td>The County originally was the FAHJ. The RSFFPD is the new FAHJ and would serve the Project if approved, as described in this section. The County finds this statement clear. Nonetheless, a reference to the County as FAHJ in FEIR Section 3.1.6 has been updated.</td>
</tr>
<tr>
<td>H-3</td>
<td>Missing analysis</td>
<td>Three off-site vegetation communities (coastal live oak woodland, Diegan coastal sage scrub, and southern mixed chaparral) were identified as potentially facilitating fire spread toward Project residences.</td>
<td>Hazards 3.1.4-8</td>
<td>How about impact on existing residences? How will Project affect fire spread outside Project footprint? With this paragraph, characterization of fire behavior at a wildfire that might occur in the vicinity of the Project.</td>
<td>To the extent that the Project would be sited between off-site residences and these habitats, the Project presence would minimize potential fire spread from these habitats to existing residences. No Project elements would increase fire danger to off-site homes.</td>
</tr>
<tr>
<td>H-4</td>
<td>Deficient model used</td>
<td>To determine fire risk in developed Project conditions, the FPP developed several scenarios modeling the potential fire behavior of a wildland fire that might occur in the vicinity of the Project.</td>
<td>Hazards 3.1.4-8</td>
<td>Elsewhere in DEIR the Rohde analysis states that the FPP analysis was based on an outdated model. Redo the analysis with the latest and best model and correct the DEIR throughout with updated results.</td>
<td>This comment is not understood. The DEIR made no reference to the Rohde report. Nonetheless, the Project modeling is appropriate, approved by the fire agencies with jurisdiction, and does not require modification.</td>
</tr>
<tr>
<td>H-5</td>
<td>Missing analysis of evacuation risk</td>
<td>A typical cause may be related to structure fires in the neighborhoods to the north and east or roadways (tossed cigarette, car fire, or electrical power line arcing).</td>
<td>Hazards 3.1.4-9</td>
<td>Discuss how Project would impact evacuation for entire area if structure fire started outside Project. How would existence of project impact ability for residents outside project to evacuate?</td>
<td>Please refer to responses regarding evacuation in the Fire Protection portion of these comments, above.</td>
</tr>
<tr>
<td>H-6</td>
<td>Contradictory statements as to characterization of fire behavior</td>
<td>The FPP concluded that given the climate, vegetative, WUI, and topographic characteristics and fire history of the area, the Project site, once developed, would be subject to occasional off-site wildfires that would be expected to be potentially fast moving and of primarily low- to moderate intensity.</td>
<td>Hazards 3.1.4-9</td>
<td>The Wildfire Risk Analysis document states that fire intensity is expected to be moderate to high, not low to moderate. Reconcile statements and provide basis for restatement.</td>
<td>As stated in the EIR on the page cited in the comment, the difference is that HGVS is built-out, and the Santa Ana-driven winds come from the north in this area. With the HGVS development, fire would not affect the site area across native fields.</td>
</tr>
<tr>
<td>H-7</td>
<td>More samples needed</td>
<td>The Phase II SEA (Appendix K-J) detected arsenic in 18 of the 21 shallow soil samples at concentrations up to 2.6 milligrams per kilogram (mg/kg).</td>
<td>Hazards 3.1.4-17</td>
<td>Phase II findings are based on a number of samples collected that are less than half of what is recommended. Redo the samples for the full recommended scope given there was agriculture onsite and contamination could exist if tests were conducted in a more thorough fashion.</td>
<td>The basis for requesting additional soil samples is not understood. Soil samples were taken from portions of the site previously in agriculture, and levels of contaminants were less than occur in native California soils. As stated in the DEIR and on FEIR page 3.1.17: &quot;Cal/HEPA generally does not require cleanup of soils to below background levels.&quot; No additional testing is required.</td>
</tr>
<tr>
<td>H-8</td>
<td>WTWRF location incomplete</td>
<td>The Proposed Project includes a WTWRF that would be located in the northern-most portion of the Proposed Project. The on-site WTWRF would be located a minimum of 315 feet from the closest on-site planned residences, approximately 930 feet from the closest HOV residential north of Harmony Grove Road, and approximately 1,250 feet from the nearest existing off-site residence to the east.</td>
<td>Hazards 3.1.4-18</td>
<td>Description completely misses mention of proximity to Waters of the US, with the Escondido Creek adjacent to the proposed facility. Please disclose distance to creek and discuss whether the type of land use is still appropriate for &quot;the handling and storage of hazardous materials for operations.&quot; Is this type of land use appropriate, or would it &quot;require&quot; something else?</td>
<td>The Project would include all standard and necessary requirements to contain unanticipated but potential releases. As stated in the paragraph after that cited in the comment: Prior to building permit approval, the proposed WTWRF would be conditioned to prepare a HMBP [Hazardous Materials Business Plan] and an RMP [Risk Management Plan] to document the type of materials proposed for plant operations, as well as, proposed storage and handling procedures, procedures for transport of materials, an emergency response plan, and an employee training program. The RMP and HMBP would be prepared and submitted for approval by the County DEH HMD [Department of Environmental Health Hazardous Materials Divisions], which is responsible for regulating HMBPs, chemical inventories, hazardous wastes, permitting, and RMPs. The preparation of a (RMP) is a regulatory requirement that would be implemented for any aspect of the Project that would include the use or storage of hazardous materials as described, prior to issuance of a building permit. The MUP for the WRF would also not be issued by the County PDS until the RMP is approved. This would assure safety measures, as discussed in the RMP, are in place. The DEH HMD is also required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations, to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances. Implementation of the RMP and HMBP would minimize the potential for accidental release of hazardous materials and the associated potential risk to public safety. These are routine and standard requirements and would address any potential for release at all. The focus on residences and schools is related to the discussion of developed land uses specifically called out in Issue 6 of the</td>
</tr>
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</table>
H-10 Fire Code exemption fails to meet intent. One of the most significant measures is construction of roads on site that include an additional travel lane that is within 800 feet of all Project structures.

H-11 Impairment potential poorly evaluated Since secondary access is not feasible given the constraints described above, the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors was evaluated. The FPFI concludes that the Project meets the intent of the code through a layered and redundant fire protection and evacuation system.

H-12 Misleading statement re: scope of proposed enhancement Central to the latter issue is enhancement of Country Club Drive, currently the only north-south circulation element providing ingress and egress to existing Harmony Grove residents south of Harmony Grove Road, as well as the HGV South and HGVP properties.

H-13 Disclosure of agreements made missing The Proposed Project would provide fair-share funding for fire and emergency medical response through participation in a Community Facilities District or other similar financing mechanism, as agreed between RSFPPD and the Applicant.

H-14 Focus inappropriately narrowed to Project residents exclusively In addition, various Project features would result in a site that is less susceptible to wildfire than surrounding landscapes and that would facilitate firefighter and medical aid response as well as Project resident evacuation in a wildfire emergency.

H-15 Fire Code exemption fails to meet code intent. The Project is providing code-exceeding measures (as described below) through a layered and redundant fire protection and evacuation system that would result in a highly defensible community, offer a means of equivalent ingress and egress, and provide contingency planning if evacuation from the site is considered unsafe.

H-16 Misleading statement re: benefit of bridge in meeting intent of Fire Code This would represent an improvement over the existing condition for the estimated 75 residential units that currently rely on Country Club Drive as their only ingress/egress. The improvements to the existing Arizonas crossing at Escondido Creek would provide year-round road access to the site and a road that can be flooded.

H-17 Misleading statement re: Shelter in place status of project The Project would incorporate the same fire protection philosophies and physical attributes as Rancho Santa Fe’s shelter in place community: an isolated area providing a last resort for potential temporary refuge if early, safe, evacuation is not possible

H-18 Misleading statement as to improved safety Existing access for several residences east of the Project crosses the HGV South site (Figure 3-1.4-1). Such access would continue to be provided through the HGV South site after development, but via improved, code-conforming on-site roadways, thereby improving the evacuation situation to the west for those off-site residences.
The difficulties associated with this route are disclosed in the EIR and FPP, and comprise the reason why it is not proposed as formal secondary access. Based on discussion with existing residents, however, this route has been used by existing residents during emergency events such as flooding of Escondido Creek, when Country Club Drive is closed. As a result, and as noted, it is not proposed as secondary access, and is not expected to accommodate heavy vehicles, but residents could be directed to use cars to exit the area via that route if so directed by emergency management personnel.

The Project would provide three separate access ways off of Country Club Drive (Figure 3.1.4-1).

Given the scope of the exemptions already contemplated, no further deviation from strict application of code should be entertained. Modify the project so there are NO lots that cannot meet standard setbacks given intense fire risk.

The Project would provide three separate access ways off of Country Club Drive (Figure 3.1.4-1).

The difficulties associated with this route are disclosed in the EIR and FPP, and comprise the reason why it is not proposed as formal secondary access. Based on discussion with existing residents, however, this route has been used by existing residents during emergency events such as flooding of Escondido Creek, when Country Club Drive is closed. As a result, and as noted, it is not proposed as secondary access, and is not expected to accommodate heavy vehicles, but residents could be directed to use cars to exit the area via that route if so directed by emergency management personnel.

The potential application of the six-foot walls would not result in additional increase in hazard to existing residents. The walls simply reflect heat from fire on the adjacent slope. The "impact" would be similar to the structure situated a short distance from the wall on the pad. Fire behavior would be reduced with the provided fuel modification zones and ignition resistant landscapes. The Project topography changes would be offset by lack of fuels on the slopes, resulting in fire behavior that is reduced from the same slope with no fuel modification. The Project is expected to lower fire danger approaching from the east as it would provide an irreplaceable break with structures not easily susceptible to ember-started fires. The Project would not increase fire danger due to Project design. As shown on Project cross-sections in EIR Figure 2.3-10, Project grading is small in size and generally follows existing contours. It would not affect wildlife behavior patterns in and of itself and there would be no increased risk to existing homes from the proposed design.

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For lots where a full 30-foot setback would not be possible, partial obliteration of a 6-foot tall, non-combustible, heat deflecting, wall would be provided as part of Project Design for additional heat and flame deflection.

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The Project does not provide improvements to Country Club Drive south of the southernmost Project entry. Project traffic is not anticipated to travel further south on this dead-end road, and there is no Project nexus. Country Club Drive north of Harmony Grove Road is not two-lane in nature. Please refer to response to Fire Protection Item 14 regarding evaluation in the Fire Protection portion of these comments, above.

The difficulties associated with this route are disclosed in the EIR and FPP, and comprise the reason why it is not proposed as formal secondary access. Based on discussion with existing residents, however, this route has been used by existing residents during emergency events such as flooding of Escondido Creek, when Country Club Drive is closed. As a result, and as noted, it is not proposed as secondary access, and is not expected to accommodate heavy vehicles, but residents could be directed to use cars to exit the area via that route if so directed by emergency management personnel.

During the site plan review process required for this Project, the FAHJ would review setbacks relative to appropriate fire standards and if the appropriate setback is unavailable, the walls would be implemented along one or more of these lots.

Given the scope of the exemptions already contemplated, no further deviation from strict application of code should be entertained. Modify the project so there are NO lots that cannot meet standard setbacks given intense fire risk.

The Project would provide three separate access ways off of Country Club Drive (Figure 3.1.4-1).

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<tr>
<td>H-26</td>
<td>Incorrect and unsupported conclusion</td>
<td>Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death from wildland fires</td>
<td>Hazards 3.1.4-26</td>
<td>Except for those located beyond the project who may be unable to evacuate because of the project. Simulation and fall modeling of evacuation scenarios all the way to safety is required in order to be able to reach this conclusion. The existing road infrastructure needs to be able to carry all the residents to safety, and it is the applicant's burden to demonstrate they can.</td>
<td>The County disagrees that existing residents &quot;beyond the project&quot; would be &quot;unable to evacuate because of the project.&quot; The DEIR and FEIR Section 3.1.3, as well as the Global Responses Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access in FEIR Chapter 8.0, and the Project FPP, provide detail as to Project design expanded fuel management zones, type and location of Project landscaping, enhanced building design standards, improvements to abutting portions of Country Club Drive that would provide an additional travel lane during emergencies, and provision of a bridge to widen and elevate the Escondido Creek crossing. All of these would not only benefit the Project, but also could improve access and evacuation actions for residents west of the Project off Country Club drive through provision of additional buffer from fires burning to the east, as well as easier evacuation from south of the creek, and (where so directed by emergency fire personnel) perhaps even a place to shelter if they cannot evacuate quickly enough. Also, although evacuation was addressed in the DEIR and FPP, an additional Evacuation Plan (Dudek 2018) has been prepared based on Project analysis and other published data and is part of the final Project files.</td>
</tr>
<tr>
<td>H-27</td>
<td>Documents missing require resetting of public review period</td>
<td>The Project would not impair implementation of either the Operational Area Emergency Plan or the Multi-Jurisdictional Hazard Mitigation Plan or interfere with evacuation activities conducted in accordance with these documents.</td>
<td>Hazards 3.1.4-27</td>
<td>Both of these were missing from the online CEQA docs and none were provided in hardcopy - hence 45 day period should start from when documents were posted.</td>
<td>These are documents prepared by regional organizations and beyond the purview of an individual project. The Project complies with CEQA and County requirements relative to hazards review.</td>
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<tr>
<td>H-28</td>
<td>Incorrect and misleading conclusion</td>
<td>With implementation of the corresponding fire protection Project features, including conformance with building and fire code provisions for alternative ingress/egress, ongoing maintenance of roads, infrastructure, vegetation management and defensible space, however, the Project would not contribute to a cumulative wildland fire risk.</td>
<td>Hazards 3.1.4-28</td>
<td>As noted elsewhere, the Project does NOT provide for alternative ingress/egress - please delete that portion of the sentence. There is only one ingress/egress, Country Club Drive. Project could contribute to a wildland fire risk by introducing urban dwellers next to large swaths of open space, including onsite o/s. As noted above, that risk needs to be better disclosed and analyzed by describing how the residents will be separated from the onsite open space.</td>
<td>The text is referring to multiple access points off Country Club Drive. Regarding potential for Project residents to increase fire risk – HGV South residents, as well as neighbors, would be restricted from entering open space by required Project fencing along native fuel lines and the primitive trail leading the DDHP. This required fencing is discussed in the EIR. The County disagrees that additional analysis is required.</td>
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<tr>
<td>H-29</td>
<td>Inconsistent population estimates</td>
<td>A development like HGV South would typically include a demographic that results in fewer calls, per capita. Using San Diego County fire agencies' calculated EI/annual calls, per 1,000 population, the Project's estimated 1,410 residents (calculated based on 3.12 persons per dwelling, SANDAG 2013)</td>
<td>Hazards 3.1.4-28</td>
<td>The population estimate is inconsistent with similar estimates elsewhere in the documentation. See for example the estimate in Section 3.1.3 Greenhouse Gas Emissions, page 20, Significance of Project Greenhouse Gas Emissions, paragraph 1. The population estimates cited throughout the documentation also may be inconsistent, resulting in unsupported, erroneous and unreasonable findings, and the entire DEIR including all supporting and reference documentation should be proofed and corrected for consistency in this regard.</td>
<td>Please see the response addressing the GHG comment in this matrix. In summary, however, although different technical data may be used based on agency preference in order to ensure consistency between like technical reports, such variation is incremental in nature, and in any event, was deleted from Revised DEIR GHG section circulated for public review from February 22 to April 9, 2018.</td>
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### Response to Comments O6-36 – Traffic

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<tr>
<td>T-1</td>
<td>Harmony Grove Road, Elfin Forest Road and intersection of Elfin Forest Road / San Elijo Road omitted from TIA</td>
<td>The study area was based on the criteria identified in the County of San Diego’s Report Format &amp; Content Requirements: Transportation &amp; Traffic, August 24, 2011. According to the County’s criteria, “the scope of the full direct and cumulative traffic assessment shall include those [Mobility Element] roads and intersections that will receive 25 peak hour trips (two-way peak hour total).”</td>
<td>Appendix D Traffic Impact Analysis, 3.0 Existing Conditions, 3.1 Study Area</td>
<td>7</td>
<td>The comment incorrectly sums the existing, Project, and cumulative trips traveling west of Country Club Drive on Harmony Grove Road. The County’s 25 peak hour trip rule is based on the Project-only traffic volumes. Per Figure 7-2 of the Traffic Impact Analysis (TIA), the TIA correctly analyzes the locations within the unincorporated County where the Project adds 25 peak hour trips or more; therefore, no changes to the study area and traffic analysis are needed. The study area for Harmony Grove Village (HGV) was larger in scale due to project generating almost twice the volume of traffic as compared to the proposed HGV South Project. The County does not identify a study area for an individual development project based on precedent in the area. As noted above, the study area is based on the Project-specific 25 peak hour trip guideline. Thus, no additional analysis of the roadways mentioned in the comment is required.</td>
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<tr>
<td>T-2</td>
<td>Existing traffic count volume collection out of date Table 3-1 EXISTING TRAFFIC VOLUMES Footnotes: a. Average Daily Traffic Volumes collected February and June of 2014 when schools were in session. Caltrans volumes taken from most recent available data</td>
<td>Table 3-1 EXISTING TRAFFIC VOLUMES, Table 3-1 Existing Traffic Volumes, Appendix D Traffic Impact Analysis, 3.0 Existing Conditions, 3.3 Existing Traffic Volumes</td>
<td>13</td>
<td>Based on the County Traffic Guidelines the count data exceeds the 18 month age of the counts. Therefore, the validity of the counts needs to be updated to conform to County requirements. The commenter incorrectly sums the existing, Project, and cumulative trips traveling west of Country Club Drive on Harmony Grove Road. The County’s 25 peak hour trip rule is based on the Project-only traffic volumes. Per Figure 7-2 of the Traffic Impact Analysis (TIA), the TIA correctly analyzes the locations within the unincorporated County where the Project adds 25 peak hour trips or more; therefore, no changes to the study area and traffic analysis are needed. The study area for Harmony Grove Village (HGV) was larger in scale due to project generating almost twice the volume of traffic as compared to the proposed HGV South Project. The County does not identify a study area for an individual development project based on precedent in the area. As noted above, the study area is based on the Project-specific 25 peak hour trip guideline. Thus, no additional analysis of the roadways mentioned in the comment is required.</td>
<td></td>
<td>The comment asserts that the baseline traffic volumes used in the analysis need to be updated to “conform to County requirements.” Traffic counts that are more than two years old can be validated if it can be demonstrated that traffic volumes have not significantly changed since prior counts were taken. The County’s Traffic Guidelines clearly state that “These are intended to serve as a guideline and are not intended to replace sound traffic engineering judgment.” In fact, the standard of practice by the County is to assess the validity of existing or baseline counts. Please note that Existing Conditions analysis assumed full development of the 742-unit HGV project which is currently under construction, with only approximately 50 percent of the planned homes having been built. Please also note that neither of the other transportation reviewing agencies (City of Escondido, Caltrans) had comments about the age of the counts in the EIR traffic study. As demonstrated in Attachment A to the Final TIA, validation counts were conducted on all 14 street segments in the study area analyzed in the TIA to determine if existing counts are higher or lower than the baseline counts used in the TIA, upon which the Project impacts are based. These counts included the six segments in the City of Escondido, and the eight destinations.</td>
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The results showed that as compared to the traffic counts used in the Project analyses, the 2017 counts are lower on 11 of the 14 roadway segments, supporting the contention that the TIA assessment was conservative when it was run, and consistent with the belief that the analysis would appropriately reflect roadway conditions and capacity by the time that Project traffic would be added to area roads.

Throughout the study area, the average reduction in traffic between 2017 validation counts and the TIA counts is ~23 percent. For the three segments that were observed to have higher traffic in 2017, the maximum increase was 10 percent (on one segment), with the other two segments being higher by 4 percent and 8 percent. A general guideline used by traffic engineers is that traffic volumes on a given roadway can vary day-to-day by as much as 10 percent, which would be within the margin of error, and therefore within expected variation. In the context of a validation comparison, a 10 percent increase on 1 of 14 segments would not indicate that the baseline volumes were obsolete, especially with an overall average reduction throughout the study area of ~23 percent. Thus, the baseline volumes remain valid as compared to existing 2017 data, and the corresponding analysis results also remain conservative.

segments in the County of San Diego. The 24-hour ADT counts were conducted on Thursday, October 5, 2017, when local schools were in session.

The Country Club Drive cumulative traffic volume between Hill Valley Drive and Kauana Loa Drive in the County of San Diego Street Segments displayed in Table 9-2 NEAR TERM STREET SEGMENT OPERATIONS is claimed to be 2280 ADT as derived by subtracting the Existing volume from the Existing + Cumulative Projects volume: 8260 - 5980 = 2280. This figure CANNOT be correct because the cumulative project traffic volume on Country Club Drive between Hill Valley Dr to Kauana Loa Dr or the Valiano project alone, as per the Valiano TIA, Valiano DEIR Appendix H, page 52, Table 9-2 NEAR TERM STREET SEGMENT OPERATIONS, is 2711, 431 greater ADT than the 2280 claimed in the HGVS TIA. In addition, 1388 more cumulative project ADT can be identified by reconciling the impact of other non-Vallanison - HGVS cumulative projects identified in the Valiano TIA with the HGVS TIA, which other cumulative projects are identical between the two TIAs except two additional cumulative projects listed in the Valiano TIA. The calculation of the additional 1388 ADT derived from the Valiano TIA is as follows: As per the Valiano TIA, Valiano DEIR Appendix H, page 52, Table 9-2 NEAR TERM STREET SEGMENT OPERATIONS, subtracting the Existing volume from the Existing + Cumulative Projects volume: 2983 - 4930 = 3053 cumulative project ADT on Country Club Dr, Hill Valley Dr to Kauana Loa Dr. The 3053 cumulative project ADT reported in the Valiano TIA includes the HGVS project as a cumulative project and the ADT for HGVS need to be deducted to derive a cumulative project ADT figure for cumulative projects other than HGVS of 3033 - 1125 = 1928. Also, the Valiano TIA list of cumulative projects includes an erroneous reference to a 216 du Harvey Grove Meadows project which should also be deducted in the amount of 540 ADT, at 1040 ADT per du and 25% distribution rate consistent with the HGVS trip distribution scheme: 1028 - 540 = 1388. The only other difference in non-HGVS/non-Vallanison cumulative projects between the two TIAs is Citracado High School/Laguna Academy, which is referred to twice in the Valiano TIA, but not at all in the HGVS TIA. Inclusion of the project is of no significance, however, because no ADT distribution on the road segment is reported per the Citracado High School/Feir TIA. Based upon this calculation, the sum of 2711, the Valiano ADT on the road segment, and 1388, the reconciled and corrected ADT for other non-Vallanison/non-HGVS cumulative projects, 4099 is the correct cumulative project ADT, not 2280 as imbedded in the HGVS TIA. It follows that the grand total ADT for the roadway segment is 5890 Existing + 1125 HGVS project + 4099 cumulative projects = 11204, a figure which exceeds the 9700 ADT capacity of the roadway segment by a significant margin.

The table below displays the cumulative traffic volumes for Country Club Drive between Hill Valley Drive and Kauana Loa Drive in the County of San Diego Street Segments displayed in Table 9-2 NEAR TERM STREET SEGMENT OPERATIONS: Country Club Drive, Hill Valley Dr to Kauana Loa Dr, as compared to existing 2017 data, and the corresponding analysis results also remain conservative.

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<tr>
<th>DATE</th>
<th>TRAFFIC VOLUME</th>
<th>SEGMENT OPERATIONS</th>
<th>COUNTY OF SAN DIEGO STREET SEGMENTS</th>
<th>ADT 7105, LOS C, Change n/a. Existing + Project +Cumulative Projects, ADT 9395, LOS E, Change 1125. Impact Type: Cumulative</th>
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<td>2017</td>
<td>2280 ADT</td>
<td>NEAR TERM STREET SEGMENT OPERATIONS</td>
<td>Country Club Drive, Hill Valley Dr to Kauana Loa Dr</td>
<td>The results showed that as compared to the traffic counts used in the Project analyses, the 2017 counts are lower on 11 of the 14 roadway segments, supporting the contention that the TIA assessment was conservative when it was run, and consistent with the belief that the analysis would appropriately reflect roadway conditions and capacity by the time that Project traffic would be added to area roads. Throughout the study area, the average reduction in traffic between 2017 validation counts and the TIA counts is ~23 percent. For the three segments that were observed to have higher traffic in 2017, the maximum increase was 10 percent (on one segment), with the other two segments being higher by 4 percent and 8 percent. A general guideline used by traffic engineers is that traffic volumes on a given roadway can vary day-to-day by as much as 10 percent, which would be within the margin of error, and therefore within expected variation. In the context of a validation comparison, a 10 percent increase on 1 of 14 segments would not indicate that the baseline volumes were obsolete, especially with an overall average reduction throughout the study area of ~23 percent. Thus, the baseline volumes remain valid as compared to existing 2017 data, and the corresponding analysis results also remain conservative.</td>
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</tbody>
</table>
15% F, yielding a service level rating of LOS F. Furthermore, the substantial exceedance of the LOS E threshold relative to the demand through a majority of left turning vehicles on Country Club Dr to Eden Valley Lane per Valiano TIA Figure 8-2 calls into question and renders unreasonable the mitigative value of the left turn lane. For these reasons, the finding of significant mitigation for the cumulative impact of the project to traffic on Country Club Drive between Kauana Lda Dr and Hill Valley Dr, the prescribed mitigation, M-TiR-3, are unsurprised because the analysis upon which the impact finding and mitigation are based is erroneous, and in fact are contradicted by cited bona fide evidence. Consequently, the traffic study data analysis, the impact findings and effectiveness of the mitigation should be readdressed based on accurate data given the critical nature of the road segment for routine daily access to the project area, as well as for emergency egress. Also, because the failure to use accurate cumulative project traffic data may skew the HOVIS TIA and DEIR, the entire HOVIS TIA and DEIR impact analysis and findings should be reviewed and corrected as necessary to reflect accurate cumulative project traffic volume data.

With regard to mitigation being unsupported due to the analysis being erroneous, the County disagrees with this comment given the explanation above confirming the accuracy of the existing plus cumulative assumptions. A detailed discussion on the effectiveness of the left-turn lane mitigation on Country Club Drive is provided in the response addressing Traffic item 13, below.

T-4 Sprinter impacts
n/a - omitted

DEIR Subchapter 2.2 Transportation/Traffic
n/a - omitted

Sprinter operations at the Country Club Drive/Auto Park Way and Nordahl Road intersection presently causes impacts and back-ups in traffic that is not presented in any of the traffic analysis. With anticipated increased Sprinter traffic, flow back-ups and delays will increase. This condition needs to be addressed in the TIA and DEIR, and potential cumulative environmental effects of increased conference of rail and automotive traffic, which is reasonably likely to exacerbate to an unmitigatable significant impact, needs to be evaluated and included in the environmental impact assessment.

T-5 Whitney Road and Eden Valley Lane roadways and intersections with Country Club Drive omitted from TIA and DEIR
The study area was based on the criteria identified in the County’s Report Format & Content Requirements: Transportation/Traffic (2011). According to the criteria, ‘the scope of the full direct and cumulative traffic assessment shall include those roads and intersections that will receive 25 peak hour trips.’

DEIR Subchapter 2.2 Transportation/Traffic
2.2-1 Existing Conditions, 2.2.1.1 Existing Roadway Characteristics

Country Club Dr/Eden Valley Lane and Country Club Dr/Mt Whitney Rd intersections qualify for inclusion in the TIA for cumulative project impact based on County guidelines but were omitted. The intersections are the primary entry/egress points for the Valiano project and cumulative project traffic impact to these intersections would be significant. Also omitted are the intersections of Country Club Drive and Trail Ridge Dr, Live Oak Road, Surrey Lane, Milpas Drive and Progress Place.

Per County guidelines, “The study area intersections should include the intersections of Mobility Element roads where project-related traffic adds traffic to the right and/or left turn movement...” Mount Whitney Road, Eden Valley Lane, Trail Ridge Drive, Live Oak Road, Surrey Lane, Milpas Drive and Progress Place are not Mobility Element roads, nor does the Project add traffic to the right and/or left turn movements. Therefore, no new analysis is required.

T-6 Conduit roadways from Country Club Drive to E Mission Rd and SR-78 omitted
The study area was based on the criteria identified in the County’s Report Format & Content Requirements: Transportation/Traffic (2011). According to the criteria, ‘the scope of the full direct and cumulative traffic assessment shall include those roads and intersections that will receive 25 peak hour trips.’

DEIR Subchapter 2.2 Transportation/Traffic
2.2-1 Existing Conditions, 2.2.1.1 Existing Roadway Characteristics

Corporate Drive which provides a conduit from Country Club Dr South to Spider Press PI and Meyers Ave or Officer St to Bishop Dr, E Mission Rd and SR-78 was omitted along with referenced roadways and related intersections which may be found to be subject to cumulative traffic impacts that would be significant.

It is true that traffic can use any public road on the street system. However, the Project trip distribution is based on a SANDAG Select Zone Assignment (SZA) traffic model that focuses on Mobility Element roads whose purpose is to carry the majority amount of traffic along the street system. Corporate Drive is not a Mobility Element road, nor is it coded into the SANDAG model, and it would not be expected to carry any substantial amount of trips for day-to-day travel patterns. Per the trip distribution shown in Figure 7.1 of the TIA, based on the HOVIS SANDAG model, zero trips are expected to use Corporate Drive. Should some amount of uncalculated traffic use this alternative route, it would divert trips from Country Club Drive between Hill Valley Drive and Auto Park Way, ultimately reducing the impact along this segment.

T-7 The HGV trip distribution is invalid as a model for the HGVs project because it is outdated and does not capture important real changes to trip
Project trip distribution was developed based on the distribution used for the adjacent HGV project, including the proposed network improvements currently under construction. The HGV project utilized a SANDAG Select Zone Assignment that distributes trips in the area based on the location of residential and employment opportunities in the surrounding vicinity.

DEIR Subchapter 2.2 Transportation/Traffic
2.2.2 Project Trip Distribution and Assignment

The SANDAG S2A trip distribution model used for HGV was based on the SANDAG Series 10 Regional Growth Forecast for the location of residential and employment opportunities and household and business information available in 2003, over fifteen years ago, and, as such, is outdated precluding the reasonable evaluation of HGV project and cumulative impacts based on current existing and forecast conditions. One example of a trip distribution factor change since the HOVIS TIA was completed in 2006 is that the trip distribution model was applied prior to the completion of the Twin Oaks Valley Road extension to San Elijo Road. This extension would have had a material effect on trip distribution. Another example of a significant change to a trip distribution factor that could not have factored into the

The SANDAG S2A trip distribution model used for both HGV and the proposed HGV SouthProject utilizes the SANDAG Series 10 County of San Diego Adopted General Plan traffic model. The traffic model is a tool to help develop the Project's trip distribution assumptions, along with existing traffic patterns and professional judgment. The HOVIS Series 10 trip distribution assumptions were previously reviewed and deemed reasonable and it is logical that the HOVIS SouthProject would have similar trip distribution assumptions.

The Series 10 traffic model is the appropriate model for use in the Project distribution for the following reasons. First, this model was meticulously developed by the County in coordination with SANDAG to input all General Plan Year 2030 land use designations. It also incorporated all planned Mobility Element roadways. The model was a custom SANDAG model not to most accurately plan for future County growth by buildout of the adopted General Plan, such data were not reflected in the other series models. Second, the age of the model is immaterial in

RTC-06-33
T-8 TR-3: Country Club Drive from Hill Valley Drive to Kauana Loa Drive (LOS E)  

**DEIR Subchapter 2.2 Transportation/Traffic, 2.2.3 Cumulative Impact Analysis, 2.2.3.1 Existing Plus Cumulative Plus Project Impacts**

2.19 This is false. The segment of Country Club Drive from Hill Valley Dr to Kauana Loa Dr would operate at unacceptable LOS F. Furthermore, the correct existing + project + cumulative project ADT is 11,204 not 9,385 as reported in the HGVS TIA, substantially because the correct existing + project + cumulative project ADT for the segment of Country Club Drive from Hill Valley Drive to Kauana Loa Drive is 11,204 not 9,385 as reported in the HGVS TIA. The analysis of existing + project + cumulative project impact to signalized intersections should be re-analyzed based on current conditions and the most recent SANDAG forecast models, and incorporate traffic distribution data that is consistent with the analysis of existing + project + cumulative project impact. The analysis of existing + project + cumulative project impact to signalized intersections should be re-analyzed based on current conditions and the most recent SANDAG forecast models, and incorporate traffic distribution data that is consistent with the analysis of existing + project + cumulative project impact. Therefore, the analysis of existing + project + cumulative project impact to signalized intersections is invalid because the cumulative project impact has been substantially underestimated in the HGVS TIA resulting in findings of significance less than what would be found if the analysis had been based on accurate data. Also, the trip distribution method used in the analysis is outdated, does not account for current trip distribution factors, and incorporates anticipated congestion of roadways. As such, temperamental data from GPS applications can change frequently and roadways. As such, temperamental data from GPS applications can change frequently and, therefore, accurately represents project and cumulative project impact to signalized intersections. The analysis of existing + project + cumulative project impact to signalized intersections should be inaccurate and not reflect the actual traffic conditions. The analysis of existing + project + cumulative project impact to signalized intersections should be inaccurate and not reflect the actual traffic conditions. The analysis of existing + project + cumulative project impact to signalized intersections should be inaccurate and not reflect the actual traffic conditions. The analysis of existing + project + cumulative project impact to signalized intersections should be inaccurate and not reflect the actual traffic conditions. The analysis of existing + project + cumulative project impact to signalized intersections should be inaccurate and not reflect the actual traffic conditions.
The analysis of impacts to unsignalized intersections is incomplete because it omits analysis of the impact to intersections along the southwestern travel corridor from the project (Impact TR-10). Therefore, the Proposed Project, along with other cumulative projects, would cause a significant cumulative impact to the following signalized intersections (Impact TR-8, TR-9, and TR-2b):

- Harmonia Grove Road
- Elfin Forest Road
- San Elijo Road
- Melrose Drive
- Rancho Santa Fe Road

These roadways and intersections meet the analysis threshold for existing + project + cumulative project impacts and they should be included in the HGVS TIA and Transportation/Traffic section of the DEIR.

The analysis of impacts to signalized intersections is incomplete because it omits analysis of the impact to intersections along the southwestern travel corridor from the project via Harmony Grove Road, Elfin Forest Road, San Elijo Road, Melrose Drive and Rancho Santa Fe Road. These roadways and intersections meet the analysis threshold for existing + project + cumulative project impacts and they should be included in the HGVS TIA and Transportation/Traffic section of the DEIR.

The analysis of impacts to signalized intersections is incomplete because it omits analysis of the impact to intersections along the southwestern travel corridor from the project via Harmony Grove Road, Elfin Forest Road, San Elijo Road, Melrose Drive and Rancho Santa Fe Road. These roadways and intersections meet the analysis threshold for existing + project + cumulative project impacts and they should be included in the HGVS TIA and Transportation/Traffic section of the DEIR.

The claim that provision of a northbound left turn lane onto Eden Valley Lane from Country Club Drive would effectively reduce this cumulative impact to less than significant is unreasonable when evaluated considering the traffic flow projected for that intersection in the Valiano DEIR. According to the Valiano TIA, Appendix H to the Valiano DEIR, Figure 8-2, only 9 of 443 existing + project + cumulative project impacts would be expected to reduce this cumulative impact to less than significant.
am peak hour travelers northbound on Country Club Drive would turn left at Eden Valley Lane. That's only 2% of am peak hour traffic; the heaviest traffic of the day, at a rate of one left turn per 6 minutes 40 seconds. Meanwhile, 103 vehicles, one every 35 seconds, are projected to turn left from Eden Valley Lane to Country Club Drive during the peak am hour. In light of this traffic flow pattern forecast in the Valiano DEIR TIA, the only recent analysis available and prepared by the same traffic consulting firm that prepared the HGVS TIA, it is unreasonable to conclude that a northbound left turn lane at the Country Club Drive/Eden Valley Lane intersection would effectively mitigate the impact to traffic flow northbound on Country Club Drive. The analysis of the flow at the intersection exhibited in the Valiano TIA also shows that not only is northbound left turning traffic the least frequent flow occurrence by far, but the incidence of left turning traffic from Eden Valley Lane at this hour is more than ten times greater and will more than make up for the reduction of impact provided by provision of a left turn lane for northbound traffic, thereby nullifying the mitigation and causing an even greater, unmitigated impact to traffic flow northbound on Country Club Drive. The finding of significant mitigatable per M-TR-3 is unsupported, unreasonable and should be reevaluated pursuant to comprehensive analysis of the Country Club Driver Eden Valley Lane intersection. Given the volume of left turning vehicles from Eden Valley Lane to Country Club, particularly in the am peak hour time frame, an all way stop or signalization should be considered as a mitigation to regulate flow and reduce the potential for vehicular conflict. Also, widening of the entire length of the unimproved portions of Country Club Drive and signalization of the Mt Whitney intersection should be evaluated as potential mitigations to ensure an acceptable level of service on this critical access road.

August 2011, the County’s Public Road Standards support and accept the practice of utilizing additional turn lanes, medians, etc. as capacity enhancing measures for roadway segments (intermittent turn lanes or medians). The removal of turning vehicles from through-traffic lanes has been identified in literature published by the Transportation Research Board (TRB) as one of several principals that improve “the safety and operations of an arterial roadway” (TRB Report S2-C05-RW 2014).

The statement that the outbound left-turning vehicles from Eden Valley Lane would negate the improvement in flow resulting from the provision of a northbound left-turn lane is unsubstantiated. The outbound left-turns would have to wait for a gap in northbound through traffic until traveling onto Country Club Drive where the northbound through movements would not need to stop to allow for these maneuvers. The improvements shown in the Valiano TIA (PDS2013-SP-13-001) indicate LOS C operations at the Eden Valley Lane/Country Club Drive intersection with the installation of a stop-sign on Eden Valley Lane and the northbound left-turn pocket on Country Club Drive, under the existing plus project plus cumulative project condition, which assumes the additional traffic from HGVS South.

It is also the case that daily street segment analysis lacks the precision of peak hour analysis, which takes into account more detailed traffic flow patterns, intersection controls, and roadway features. It also represents the highest accumulation of traffic volumes throughout a 24-hour period. As indicated in the Valiano TIA and the HGVS South TIA, the peak hour intersection operations along Country Club Drive are forecasted to operate at LOS D or better between Harmony Grove Road and Auto Park Way with implementation of the mitigation measures by both projects (those of which overlap requiring either project to complete).

Ultimately, it should be noted that the future construction of Citracado Parkway as a four-lane Major Road alleviates the temporary near-term impacts along Country Club Drive, as shown in Table 10-2 of the HGVS South TIA. Level of service C is indicated in the future according to the County General Plan with the inclusion of the General Plan Amendment projects in the area.

Given the lower turning movement volumes from private drives along Country Club Drive (including Mount Whitney Road and Eden Valley Lane), stop-sign warrants would not be met to control north/south through moving traffic along Country Club Drive. The County does not utilize stop signs as traffic calming measures since, if unwarranted, they are often ignored and/or can result in rear end collisions. Traffic signal warrants also would not be met given the lower traffic volumes turning from these intersections.
Response to Comments O6-36 – Recreation

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<tr>
<td>R-1</td>
<td>Mileage of nearby trails.</td>
<td>These large open space reserves contain a total of approximately 1,558 acres (including the Olivenhain dam and reservoir) with an associated 9 miles of trails.</td>
<td>DEIR Chapter 3.1.10 Recreation</td>
<td>3.1.10-1</td>
<td>The website for the DDHP listed the trail mileage as 1.5 miles (<a href="http://www.sdparks.org/content/sdparks/en/park-pages/DelDiosHighlands.html">http://www.sdparks.org/content/sdparks/en/park-pages/DelDiosHighlands.html</a>) and the website for the EFRR lists the trail mileage as 11 miles (<a href="https://elfinforest.olivenhain.com">https://elfinforest.olivenhain.com</a>) for a total mileage of 12.5 miles.</td>
<td>Thank you for identifying this typographical error. The cited text has been corrected on page 3.9-1 of the FEIR to be consistent with the comment, and existing text in Subchapter 2.1 on page 2.1.5. That DEIR text noted that the DDHP has a 1.5-mile long firebreak/trail, located at its closest point approximately 0.1 mile south of the Project boundary and 0.3 mile south of proposed development footprint, that extends from Del Dios Highway to intersect with the “Way Up” Trail in the EFRR, and that the EFRR maintains approximately 11 miles of trails transecting 750 acres overlaying portions of the ridgeline separating the Escondido Creek valley and the area surrounding Lake Hodges.</td>
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<td>R-2</td>
<td>HGV Equestrian Ranch</td>
<td>Following development, the approved and adjacent private HGV Equestrian Ranch would be expected to host equestrian events open to the public that could be attended by future Project residents and would be accessible via Project connecting trails and a pathway.</td>
<td>DEIR Chapter 3.1.10 Recreation</td>
<td>3.1.10-1</td>
<td>The county has approved the development of the HGV Equestrian Ranch but it is unclear when or if this will actually come to fruition. The original developer of HGV was New Urban West. When the economy collapsed in 2008, Standard Pacific took over most of the HGV development except for the Equestrian Ranch and the land approved for a retail center, which stayed under control of New Urban West. Neither of these parcels have seen any movement towards development.</td>
<td>Comment noted. The comment does not raise any specific issues related to the adequacy of the EIR. Therefore, no further response is required.</td>
</tr>
<tr>
<td>R-3</td>
<td>Summit Trail</td>
<td>As shown on Figure 1-17, in the immediate vicinity of the Project, the County has identified four proposed trails, three of which are identified as “first priority,” as indicated by asterisks below: . . . 3. *Summit Trail (12), extending southerly approximately 0.2 mile from the Lake Hodges Trail into the heart of the Project . . .</td>
<td>DEIR Chapter 3.1.10 Recreation</td>
<td>3.1.10-3</td>
<td>Need clarification on how the county proposed priority trail, Summit Trail, would be placed on the graded 40 ft. embankment shown in figure 1-17. As shown in the HGVS figure 1-17 the natural hillside will be removed, topped off, and an embankment created which appears to be too steep for the trail proposed in the CTMP.</td>
<td>This is a misunderstanding on the part of the commenter. As described in footnote 6 on page 1-20 of the DEIR, the Summit Trail “does not currently exist and is not part of the Project. This potential trail would adversely affect Proposed biological open space and increase edge effects. It was therefore deleted following coordination with Parks and Recreation.”</td>
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</table>
R-4 Landscape Plantings

11. The plant palette may be modified in the future design phases

DEIR Chapter 3.1.10 Recreation

Figure 1-20b: Explain what this means. Will this change from a mostly native plant palette with some non-natives used in the less natural areas to plantings of mostly non-natives? What would be the reasons that the listed plants might not be used?

The County would like to clarify that EIR Figure 1-20b, Landscape Plan does include Note 11: “The plant palette may be modified in the future design phases.” However, this change is restricted by Note 6, which requires a “Modified California Native” plant palette that utilizes drought tolerant and native species. Therefore, while the species may change from what is noted in the Conceptual Landscape Plan, native and drought tolerant species are still required.

R-5 Landscape Plan

The primary streetscape tree is the California Pepper.

DEIR Chapter 3.1.10 Recreation

Figure 1-20b: The California Pepper would not be an appropriate tree to plant near the Escondido Creek and the other preserved areas surrounding the project for two reasons: 1) It is considered undesirable in regards to fire (http://www.sandiegocounty.gov/pds/docs/DPLU199.pdf). 2) Not native to San Diego County and is able to naturalize in our environment thereby spreading and invading into protected natural spaces (http://www.calipc.org/ip/management/snow/pages/detailreport.cfm?usernumber=72&surveynumber=162.php and http://homeguides.sfgate.com/problems-pepper-tree-plants-69894.html).

The invasive nature of the California Pepper was considered during approval of HGV, and again in evaluation for HGV South. Project design features restrict use of California Pepper within 50 feet of riparian habitat, where moist soil could encourage germination.

R-6 Elusive Table 7

Parks would be funded through mechanisms described in the Project Specific Plan on Table 7.

DEIR Chapter 3.1.10 Recreation

3.1.10-5 Table 7 was not found. It is either missing or it needs the page number listed in the reference to make it easier for the reviewing citizens to find.

The comment is unclear. The County was unable to locate the inconsistency in the Specific Plan.

R-7 Trail Encroachment

Trail 13, also largely located within the Project parcel in open space, is routinely used by the existing local community and would be retained within a 20-foot trail easement. This currently unimproved primitive trail (County trail nomenclature) continues south to meet the east-west trending Del Dios Highlands Trail in the DDHP. It would be improved by the Project from its current 2-to-6 foot width to 4 to 6 feet in width to the DDHP boundary, as necessary, and dedicated to the County.

DEIR Chapter 3.1.10 Recreation

3.1.10-6 The existing primitive trail currently gets used by a limited number of hikers and equestrians, predominantly from the neighborhood. Improving it, adding 453 homes, connecting it to the HGV trails, and dedicating it to the County, will significantly increase the number of users of the trail. How will the developer prevent these users from encroaching on the private and preserved properties which are adjacent to these trails?

As stated in Chapter 1.0, Project Description, on page 1-20: “Trails would be constructed with decomposed granite or similar soft surface material and would comply with appropriate San Diego County Trail Designation and County Design and Construction Guidelines. Fencing would be used as needed.” County requirements, fencing and signs regarding biological open space would combine to keep users from encroaching on adjacent uses.

R-8 Increased use of existing parks

With the provision of the new parks and recreational facilities to serve the Project and the public, combined with the additional PLDO payment, the Project would not increase the use of existing neighborhood parks, regional parks or other recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated.

DEIR Chapter 3.1.10 Recreation

3.1.10-6 Provide evidence of this statement. It would seem to be inherently untrue. The small, developed parks within the project are very different from the natural adjacent parks such as Del Dios Highlands, Elfin Forest Recreational Reserve, and the San Dieguito River Park. The new developed trails will give the new residents of HGV and HGVS access to these parks, significantly increasing the amount of foot, bike, and equestrian traffic on these already busy parks.

By developing on-site parks used by Project residents and members of the public, as well as paying PLDO for other developed active or passive park uses, the Project removes cumulative wear on off-site park facilities by providing additional recreational venues for the public. With additional taxes provided by the residents of this Project, the County would receive additional funds for maintenance obligations. The Project also would add additional open space reserves, which will also require an endowment to ensure that future maintenance would be provided, as well as fencing identified in the EIR to restrict public access into the preserve area. As discussed in the EIR, the County Master Trails Program envisioned the trails through and across this property and their use by County residents.
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<td>R-9</td>
<td>Cumulative affects on existing parks</td>
<td>... the cumulative projects would not increase the use of existing neighborhood parks, regional parks or other recreational facilities such that substantial physical degradation of these facilities would occur or be accelerated.</td>
<td>DEIR Chapter 3.1.10 Recreation</td>
<td>3.1.10-7</td>
<td>Provide evidence of this statement. The local adjacent parks, Del Dios Highlands Preserve, the Elin Forest Recreational Reserve are much more affected by the increase in visitation and use that would come from increased development to the area than developed recreational parks. Damage to the preserves can’t just be “fixed” or “cleaned up.” Overuse of these parks can result in decreased flora and fauna which would take years to repair if it ever could be repaired.</td>
<td>Please refer to responses addressing Recreation items 7 and 8. Trails are allowed uses in preserve areas under County guidelines. Both DDHP and the EFRR contain trails for public use, as described in FEIR Section 3.1.9. The Project primitive trail would hook directly into the large existing DDHP firebreak trail.</td>
</tr>
<tr>
<td>R-10</td>
<td>Significant Impacts</td>
<td>Based on the analysis provided above, the Proposed Project would have less than significant impacts related to parks and recreation.</td>
<td>DEIR Chapter 3.1.10 Recreation</td>
<td>3.1.10-7</td>
<td>Provide evidence of this statement. No actual reports were shown. Maybe an environmental/biological review should be done to evaluate how this Project along with the HGV development and possibly the cumulative effects of all the local developments that might impact DDHP and EFRR, as well as any preserved areas on the San Dieguito River Park.</td>
<td>Please refer to the response addressing Recreation item 8.</td>
</tr>
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A-1 Expanding an existing village
The underlying purpose of the Project is to accommodate a portion of the projected population growth and housing needs in the unincorporated area of San Diego County by expanding an existing village that will further enhance and support the success of that village...

A-2 Location near transit centers
Contribute to the establishment of a community that encourages and supports multimodal forms of transportation, including walking and bicycling, by locating near regional employment and transit centers.

A-3 Compatibility with existing development
Create a mixed-use development that is compatible with existing and planned development in the immediate vicinity of the property.

A-4 Plan compatible with project objectives
Encourage adaptive grading, wherever feasible, that utilizes grading techniques such as selectively placing development in a manner that visually and physically responds to the site's physical variables (such as steep slopes, views, streams, etc.), preserving significant topographic features and taking advantage of existing site features.

A-5 Completion of Harmony Grove Village
Alternative Location - "...the property was purchased with the intention of completing the existing HGV village," is not owned by the developers of HGVS and was not proposed with HGVS as a part of it. Unless the property is to be provided to demonstrate that some of the slopes on the site are not protected under the ordinance. The Project grading plan does apply to the area of Harmony Grove South of Harmony Grove Road as we only have access to our homes via one entrance on Country Club Drive. We also have limited public services such as no sewer, no cable service, no high speed internet service, land telephone lines are overhead. Public transportation is not within walking distance (greater than ½ mile away). Nearest grocery stores are 3.4 miles and 4.1 miles away.

A-6 Reason this was rejected
Steep Slope Avoidance Alternative - The potential to design alternatives with development located further from preserved areas located south of the site and/or other potential edge effects through clustering of development out of the southern third of the site (while still providing the housing numbers necessary to support on-site sewage treatment) led no evaluation of the Steep Slope Avoidance Alternative.

A-7 Recreational opportunities
No Project/No Development Alternative - It also would not provide any of the amenities offered to the community at large relative to support of multi-modal transportation options, provision of a variety of passive and active recreational opportunities, or provision

Response to Comments – Alternatives

A-1 Expanding an existing village
This Project is not an expansion of the existing village in HGVS as it is proposed. The village concept in HGVS is a higher density in the center retaining the existing residences move away from the center. HGVS's property is outside of the village center across Harmony Grove Road as proposed, actually puts higher density housing of multifamily dwellings adjacent to the multi acre parcels homes that currently exist in Harmony Grove. In other words, the highest density right next to the lowest density in Harmony Grove. This goes against the County's General Plan.

A-2 Location near transit centers
The two transit centers are at Nordiath Road and the Escondido Transit Center. These are not within easy walking distance (2.8 mi to Nordiath Sprinter - approx. 1 hour walking). 3.4 mi to Escondido Transit Center - approx. 1 hour (12 minutes walking). One-half mile has become the accepted distance for gauging a transit station's catchment area in the U.S. It is the de facto standard for planning transit oriented developments in America (Guerra, Erick, Cervero, Robert, and Tischler, Robert. "The Half-Mile Circle: Does it Best Represent Transit Station Catchments?" University of California, Berkeley. July 2011, Web. 1 May 2017. http://www.its.berkeley.edu/sites/default/files/publications/UCB/2011/WP/JUCB-ITS/WP-2011-5.pdf).

A-3 Compatibility with existing development
The mixed-use development is incompatible with the current adjacent properties which are single family homes on ½ acre and larger parcels on septic with agricultural designation. In addition to the agricultural homes the proposed project is also surrounded by large preserved parcels of coastal sage scrub communities, chaparral communities and riparian areas containing rare plants and animals as well as many examples of plants and animals typical to coastal sage scrub and chaparral. As was stated in the County General Plan, "Rural areas are not appropriate for intensive residential or commercial uses due to significant topographical or environmental constraints, limited access, and the lack of public services." (San Diego County General Plan: A Plan for Growth, Conservation and Sustainability. County of San Diego. August 2011. P. 3-8, Web. 1 May 2017) This would apply to the area of Harmony Grove south of Harmony Grove Road as we only have access to our homes via one entrance on Country Club Drive. We also have limited public services such as no sewer, no cable service, no high speed internet service, land telephone lines are overhead. Public transportation is not within walking distance (greater than ½ mile away). Nearest grocery stores are 3.4 miles and 4.1 miles away.

A-4 Plan compatible with project objectives
If this is one of their objectives, then why are they asking for a steep slope waiver? The grading should be minimized so the current topography is maintained. If the property was divided into parcels similarly sized to the current residential parcels of ½ acre and larger, then the homes would be built in keeping with the topography. This is because large scale grading, removing hills, and filling in valleys would be too costly for individual homeowners. The developer should be required to match the current residential density.

A-5 Completion of Harmony Grove Village
The statement is intended to disclose the intent of the current owner of the HGVS South property. He did purchase the property with the intent to extend and complete the village.

A-6 Reason this was rejected
This section should include some mention of the higher cost of developing the southern portion which could be cost prohibitive due to a water carved canyon. Other portions of the development are being planned to adjace to other preserved lands (the Escondido Creek) so it should be matched up, and explained why the land should be developed next to some preserved lands and not others. As for the need for a larger density development to support the on-site sewage treatment, this could be avoided by a smaller development utilizing septic systems which is consistent with the rest of the Harmony Grove community and the Efin-Forest/Harmony Grove Community Plan within the County General Plan.

A-7 Recreational opportunities
Provide evidence that these amenities are needed specifically in the Harmony Grove community. The community has not asked or wanted these amenities. There are plenty of planned development in the unincorporated areas of San Diego County that offer these types of amenities. The community members live in the rural Harmony Grove area to be away from developer created recreation and to enjoy natural open space and room between neighbors. If this was what

RESPONSE TO COMMENT
The County finds that the Project would constitute an appropriate expansion of an existing village. Please refer to Global Response: General Plan Consistency with Land Use Policy 1.4 for detail.

The cited 0.5 mile is a development standard used for addressing transit-oriented development (TOD) projects. The HGVS South Project is not a TOD priority project. The cited discussion addresses only general proximity to these facilities – often accessed by nearby residences for transfer from private vehicles to public transportation. The County also disagrees that less than 3 miles distance to the Nordiath Station is beyond achievable pedestrian distance. The proximity to two such stations is unusual for residents of the unincorporated County, where such stations are usually at a far greater distance.

Please see the Global Response to Project Consistency with General Plan Policy LU1-13 which includes analysis of land use compatibility with the surrounding area, including the adjacent Harmony Grove Village (HGVS). The site is planned for semi-rural rather than rural uses in the General Plan, and allow for new homes to be built on site. Please note that an alternative in Chapter 4.0 of the EIR specifically provides for larger lots. All necessary utilities are located adjacent to the site and can be extended into the site, already cross the site, or could be independently provided by the Project. The information regarding distance to public transportation and grocery stores is inconsistent with the EIR.

The waiver is requested in accordance with the Resource Protection Ordinance (RPO) because grading is considered a significant topographic feature. The grading is provided to demonstrate that some of the slopes on site are not protected under the ordinance. The Project grading plan does respond to the sites physical variables and maintains steep slopes, views, streams, etc. as well as preserving on-site significant topographic features. Please see discussion in Subchapter 2.1, Aesthetics, of the EIR, including the cross-sections demonstrating variation between existing topography and Project grading shown in Figures 2.1-10, Topographic Cross Sections.

Although decision makers may take costs into account during deliberations, costs are not considerations in CEQA environmental evaluations. No amendments to EIR text have been made in response to costs. The focus on alternative discussion relative to preserving areas south of the Project parcel is due to the difference in the alternative design from the Proposed Project in this area. Alternative discussions focus on differences from the Project. In this instance, the primary difference would be the evaluation of developed uses closer to the boundary with another preserve, which would occur in the south of the Project. Developed uses are still proposed for more northern portions of the site. Relative to fewer homes, Project alternatives were variously designed to address different environmental issues. Lesser density alternatives also were proposed and evaluated. The Environmental documentation demonstrates consistency with the General Plan. CEQA does not require evidence that project amenities are needed. CEQA Guidelines Section 15124 addresses project description, and Section 15124(b) specifically addresses objectives. In all section states that the objectives should include the underlying purpose of a project and that clearly written objectives will (later) help the lead agency develop a reasonable range of alternatives, and, potentially, aid the decision makers in preparing findings or a statement of overriding considerations, if necessary.
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<tr>
<td></td>
<td>A-8 Housing and biological conservation</td>
<td><a href="#A-8">A-13</a></td>
<td>1-10</td>
<td>4-8</td>
<td>This alternative is one which should be considered by the County. As described in the DEIR this alternative is superior to the Project in the areas of aesthetics, transportation/traffic, biological resources, cultural resources and tribal cultural resources, noise, and air quality. It is possible that due to the lack of infrastructure in this rural area (e.g. sewer, cable, internet, roads, shopping) as well as the severe fire risk and limited egress, this parcel would be better used as mitigation for a larger development in another portion of San Diego County than has or can more easily develop the infrastructure and would not place it's residents in a severe wildfire risk area with only one exit. An example would be the proposed Newland Sierra development still in the development stage. According to the Voice of San Diego (Rivard, R.june 9, 2017, Environmentalist Say Conservation Plan Is Being Used to Give One Development a Leg Up) the Department of Fish and Wildlife has been asking Newland Communities, the potential developer, to find more mitigation property to preserve before approving the proposed development due to the presence of nesting California Gnatcatchers. The property proposed for the HGV's development also contains breeding gnatcatchers so could be a reasonable parcel for environmental mitigation for Newland Sierra or another development. This parcel also abuts the DDHP which could allow for freedom of movement of native animal species.</td>
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<td></td>
<td>A-9 Water quality improvement</td>
<td><a href="#A-9">A-12</a></td>
<td>1-11</td>
<td>4-8</td>
<td>Where is the data to substantiate that this would first of all, improve the water quality. Secondly, if we assume without data that the water quality is improved by a new bridge, it would likely be decreased by the amount of solvents, detergents, and trash run off coming off of a developed area due to the increase in asphalt, cement, and increased population.</td>
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<td>A-10 Possible Escondido Creek sewage contamination</td>
<td><a href="#A-10">A-11</a></td>
<td>1-12</td>
<td>4-13</td>
<td>Provide evidence that the specific septic system being proposed would more likely to cause contamination to the creek than the in-site sewage system. The Project has already caused sewage contamination to split into the Escondido Creek (Notice of Violation No. R-8-2017-0026, CalAtlantic Homes, Harmony Grove Village Development, Escondido, San Diego County). According to the DEIR, &quot;Due to the small size of HGV South, it is likely that the Project would truck solids to another wastewater treatment plant for dewatering. This would require transport to that facility by an estimated one truck per week.&quot; This appears to be a permanent plan. This would seem to be an area of potential spillage, not to mention the potential for fingering odors between the new bridge and the solid out. This should be addressed in the DEIR. How will the development deal with odor of solid storage and the risk of spillage in transporting this waste?</td>
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<td>A-11 Expanding an existing village</td>
<td><a href="#A-11">A-10</a></td>
<td>1-13</td>
<td>4-13</td>
<td>The existing village should not need increased development in Harmony Grove in order to be successful as it is a separate development which was previously approved by the SDCBOS as a self-sustaining village. HGV is attempting to tag on to the HGV development as if it is an extension of HGV when it is not. The land owners and developer are completely separate. This alternative however is more consistent with the General Plan of the Village concept of having less dense housing as you move farther from the village center. The Project as proposed actually has higher density significantly outside of the village center in HGV and up against rural properties in the surrounding community.</td>
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<td>A-12 Effects on jurisdictional water</td>
<td><a href="#A-12">A-9</a></td>
<td>1-14</td>
<td>4-18</td>
<td>The difference in jurisdictional water between this alternative and the project are not clear. The impacts due to brush management and build footprint should be detailed here in the proposed Project and specifically compared to this alternative.</td>
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<td>A-13 Operational effectiveness of HGV</td>
<td><a href="#A-13">A-8</a></td>
<td>1-15</td>
<td>4-20</td>
<td>Explain why HGV needs more development in order to optimize operational effectiveness of facilities and services. The reader to understand this statement.</td>
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The comment is not understood. If the request is for the No Project Alternative to be considered, the County is included in Chapter 4.0 and will be considered by the decision makers. If the proposal is that instead, the Project parcels should be considered as mitigation for other projects' impacts, such consideration is beyond the ability of this Applicant to secure. No offers have been made to purchase the property as mitigation.

The proposals are readily understandable – removing an all-grade crossing that floods or has run off from rain events directly into the creek that carry fuels and vehicular travel elements, would benefit water quality. The site runoff would be filtered and enter the area storm drains, as described in FEIR Section 3.1.3. Hydrology/Water Quality. Runoff from developed areas would not free-flow into the creek.

The potential impacts associated with wastewater, including accidental contamination, is included in EIR Section 3.1.4, Hazards and Hazardous Materials, and technical appendix K.2, Hazardous Materials Records Review Update. The same requirements would apply to an alternative which proposed similar wastewater facilities and infrastructure.

An expansion of an existing or planned village in accordance with General Plan Policy LL1 4.0, does not require the same owners for both the existing village nor the expanded portion of the village. The EIR does not state that increased development is needed for the success of HGV. Rather, the additional homes and civic/commercial uses added by HGV South would help create one complete and vibrant community that would enhance and support the economic and social success of HGV and Project by increasing the number and diversity of residential and civic/commercial opportunities.

The County disagrees that the details of the differences in impacts to jurisdictional waters between the proposed Project and the General Plan Consistent Alternative with Sewer Alternative are unclear. It is clear from the cited text that for this limited element, the alternative is preferred over the Proposed Project. Such difference is not substantial, however. The brush management impacts are shown on Figure 2.3-5 as part of Project impacts, and the location relative to the drainage is depicted.
Creek Escondido sewage across storage

Sewer Pipe

HGV SEwer Treatment Facility (HARRF) run by the City of Escondido, has in the past had so many discharge violations into the Escondido Creek that they were fined $1.3 million in 2015 (Lau, Angela. “Escondido’s Village Development, Escondido, San Diego County) and a lingering odor at the pump station. Provide documentation on emergency plan for containing contamination for possible pipe breakage and sewage spill. Who would pay for this reassessment? The developer? The HOA? The County? Provide documentation on how the County would make this GPA.

Sewer Option Alternative - Due to the north along Country Club Drive into the off-site utilities would include the gravity included within the on-site facilities, and Treatment - A pump station would be built commensurate with the Project within the reconditioned storage as only a portion of the available reservoir would allow for additional weather storage on HGV, or it could be expanded from the existing HGV WRF could be used to serve the Proposed Project if actual uses at the HGV WRF demonstrate that it could accommodate the flows from both the Proposed Project and HGV as it is currently built.

Alternative - No commercial uses or facilities would be provided because the fewer number of single-family dwelling units in this alternative would not be able to support such uses on site. Biologically Superior Alternative - . . . this alternative would preserve 3.5 acres of the Intermediate Value sage scrub habitat in the eastern area, and would avoid impacts to a portion of the habitat supporting the gnatcatcher nest location and surrounding foraging and dispersal habitat.

Superior Alternative - Due to the small size of HGV’s South. It is likely that the Project would truck liquid solids to another wastewater treatment plant for dewatering regardless of sewer option selected. This would require transport to that facility by an estimated one truck per week.

Biologically Superior Alternative - . . . this alternative would preserve 3.5 acres of Intermediate Value sage scrub habitat. How could the project be changed to preserve it? This is not an insignificant point made in the document. Why couldn’t the 3.5 acres of Intermediate Value sage scrub be preserved in the Project. How could the project be changed to preserve it?

Biologically Superior Alternative - Due to the small size of HGV’s South. It is likely that the Project would truck liquid solids to another wastewater treatment plant for dewatering regardless of sewer option selected. This would require transport to that facility by an estimated one truck per week.

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<tr>
<td>A-22</td>
<td>Operational Studies</td>
<td>Additional operational studies, as well as design plans and specifications, would be required for all of the facilities described above. These studies and plans are not expected to affect the environmental analyses below.</td>
<td>4-37</td>
<td>Provide evidence that the operational studies, design plans and specifications would not affect the environmental analyses. Why wouldn't design changes have changes to the environmental analysis?</td>
<td>Operational studies potentially resulting in design plan changes or specifications would not be expected to affect existing environmental analyses because the analyses were conservative, based on the largest footprint and use factors that would be expected to result in environmental effects. The quote cited immediately preceded text explaining this: The Proposed Project analyzed the largest potential facility, with the associated largest footprint. As such, it represents a worst-case footprint and potential alternative elements adequate to complete environmental analyses on site, and otherwise would place lines into already disturbed paved street (also affected by placement of Proposed Project utilities). Refinement of the alternative scenarios would not worsen environmental impacts associated with these lesser design scenarios. Future design changes would be expected to affect such items as the specific design of equipment internal to the Project WTWRF, pipeline couplings, etc. as specific products are confirmed. Changes that rise to the level of new analyses are not anticipated, but if they did occur, would require a conformity analysis consistent with County requirements, and if new impacts were identified, would require CEQA review. Moreover, please note that the alternative analysis quoted in the comment is provided for comparative purposes only. CEQA does not require the same level of detail provided for the proposed project; therefore, it is not necessary to provide the details requested in the comment.</td>
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<td>A-23</td>
<td>Sewer Alternative Impacts</td>
<td>A number of these impacts may vary slightly from those identified for the Proposed Project; however, these variations would be relatively minor and would not alter overall Project impact levels or associated need for mitigation or implementation of specified Project Design Features.</td>
<td>4-42</td>
<td>Provide evidence for the statement that variations in impacts would be minor and would not need mitigation. Specify what the impacts could be.</td>
<td>Please see the response addressing Alternatives item 22.</td>
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## Response to Comments – Infrastructure

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<tr>
<td>I-1</td>
<td>Funding for the Country Club Bridge</td>
<td></td>
<td>Specific Plan</td>
<td>?</td>
<td>Who is going to pay for it? The Specific Plan talks about it being funding at a later date.</td>
<td>The Project will pay for the bridge. Fair share payments from others may be sought in the future. This has been clarified in the Specific Plan.</td>
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<td>I-2</td>
<td>Disclosure of school fees agreement</td>
<td>The ordinance requires execution of a binding agreement between an applicant and the affected school district prior to those legislative approvals. Such an agreement can consist of a statement by the affected district that fees routinely assessed at the building permit stage are sufficient to mitigate impacts, and that no agreement is necessary.</td>
<td>Public Services section</td>
<td>3.1.9-4</td>
<td>What is it in this case? Was an agreement signed with EUHS given the impact Project will have on schools? Was EUSD properly notified and did they choose to forgo option “to levy statutory developer fees at a higher rate for residential development than previously allowed”? Where is the copy of the agreement?</td>
<td>As stated on page 3.1.8-6 of the FEIR and on the Project Facility Availability Forms for schools in Appendix O of the EIR, fees would be paid during the building permit issuance process and would constitute full and complete mitigation of schools impacts. The school districts have indicated in their signed forms in Appendix O that fees would be collected at that time. No additional documentation is necessary.</td>
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Response to Comments – GHG

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<td>GHG-1</td>
<td>Inconsistent population estimates</td>
<td>Based on SANDAG forecast data for the Project’s census tract (census tract 203.07), on average, 2.63 residents are expected to reside in each dwelling unit and 18 jobs are anticipated to be generated per developed employment acres, for a total service population of 1,193 persons (SANDAG 2016).</td>
<td>DEIR Subchapter 3.1.3 Greenhouse Gas Emissions</td>
<td>3.1.3-20</td>
<td>The population estimate is inconsistent with similar estimates elsewhere in the documentation. See for example the estimate in Section 3.1.4 Hazards and Hazardous Materials, page 28, paragraph 3. The population estimates cited throughout the documentation also may be inconsistent, resulting in unsupported, erroneous and unreasonable findings, and the entire DEIR including all supporting and reference documentation should be proofed and corrected for consistency in this regard.</td>
<td>The opportunity for clarification on this issue is appreciated. Use of SANDAG forecast data for the Project’s census tract in the DEIR was provided for GHG analyses as it allowed for consistency on this topic among projects throughout the region. Variation between the Project and other projects (based similarly on technical agency standards for specific technical issues) did not affect Project findings. Regardless, the cited text was deleted in the Revised DEIR circulated relative to GHG from February 22 to April 9, 2018. There is no inconsistency in the FEIR related to those numbers.</td>
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