

COMMENTS	RESPONSES
<div data-bbox="205 321 560 407" data-label="Image"> </div> <div data-bbox="210 451 386 492" data-label="Text"> <p>20223 Elfin Forest Road Elfin Forest, CA 92029</p> </div> <div data-bbox="210 535 489 644" data-label="Text"> <p>Ms. Ashley Smith Land Use &amp; Environmental Planner Planning &amp; Development Services 5510 Overland Avenue, Suite 310 San Diego, CA 92123</p> </div> <div data-bbox="210 657 478 680" data-label="Text"> <p>E-Mail: <a href="mailto:Ashley.Smith2@sdcounty.ca.gov">Ashley.Smith2@sdcounty.ca.gov</a></p> </div> <div data-bbox="210 695 938 760" data-label="Text"> <p>Re: Harmony Grove Village South Draft Environmental Impact Report (PDS2015-GPA-15-002; PDS2015-SP-15-002; PDS2015-TM-5600; PDS2015-REZ-15-003; PDS2015-MUP-15-008; PDS2015-ER-15-08-006.)</p> </div> <div data-bbox="210 779 321 803" data-label="Text"> <p>Dear Ashley:</p> </div> <div data-bbox="210 821 932 888" data-label="Text"> <p>Thank you for the opportunity to comment on the DEIR for this General Plan Amendment. This letter supplements that sent by our law firm, Shute, Mihaly and Weinberger, as well as the spreadsheet submitted as "HGVS DEIR comments.pdf."</p> </div> <div data-bbox="210 906 940 1034" data-label="Text"> <p>The Elfin Forest Harmony Grove Town Council finds that the DEIR fails to disclose and mitigate for the impacts of breaking the compromise agreement embedded in the General Plan, impacts which may reverberate county-wide as communities learn that their elected officials may not be trusted to uphold carefully crafted plans, should this amendment be approved. The result might be a lack of willingness to compromise on future collaborative efforts, and should be analyzed in the DEIR.</p> </div> <div data-bbox="210 1052 936 1183" data-label="Text"> <p>There are excellent reasons why the General Plan in its wisdom only allowed 25 units originally on these 110 acres, and the most compelling is public safety, something we expect decision makers to prioritize over all other concerns and potential inducements. Granting exemptions to the secondary egress and maximum dead-end road requirements from the Fire Code, at the same time as the DEIR cites the shortfall in funding for the local fire station as a benefit of the project, only raises questions about the integrity of the process.</p> </div> <div data-bbox="210 1201 928 1287" data-label="Text"> <p>On a weekend where we saw over 60 people burned alive in their cars as they tried to evacuate from a wildfire in Portugal, in terrain and climatic conditions eerily reminiscent of Harmony Grove, it is with a somber mood and a full appreciation of what is at stake for our residents that we write these comments.</p> </div> <div data-bbox="756 232 940 256" data-label="Section-Header"> <p><b>Comment Letter O6</b></p> </div> <div data-bbox="741 269 911 459" data-label="Text"> <p>2017 Board Members Jacqueline Anisaud-Benjamin, Chair JP Theberge, Vice Chair Jan Denry, Secretary Nancy Goodrich, Treasurer Eric Anderson Jon Dunner Angelique Hartman Scott Sutherland</p> </div> <div data-bbox="760 513 869 537" data-label="Text"> <p>June 20, 2016</p> </div> <div data-bbox="953 828 1005 850" data-label="Text"> <p>O6-1</p> </div> <div data-bbox="953 1011 1005 1036" data-label="Text"> <p>O6-2</p> </div> <div data-bbox="953 1227 1005 1250" data-label="Text"> <p>O6-3</p> </div>	<div data-bbox="1066 165 1430 194" data-label="Section-Header"> <p><b>Response to Comment O6-1</b></p> </div> <div data-bbox="1066 201 2011 271" data-label="Text"> <p>These are introductory comments that identify the commenter. The comments are not at variance with the EIR and do not require a response.</p> </div> <div data-bbox="1066 303 1434 332" data-label="Section-Header"> <p><b>Response to Comment O6-2</b></p> </div> <div data-bbox="1066 339 2011 448" data-label="Text"> <p>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:</p> </div> <div data-bbox="1176 480 1890 579" data-label="Text"> <p><i>The General Plan is intended to be a dynamic document and must be periodically updated to respond to changing community needs.</i></p> </div> <div data-bbox="1176 609 1890 708" data-label="Text"> <p><i>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.</i></p> </div> <div data-bbox="1066 734 2011 803" data-label="Text"> <p>Please also see the Global Response to Project Consistency with General Plan Policy LU-1.4 for a full discussion relevant to this issue.</p> </div> <div data-bbox="1066 836 1434 865" data-label="Section-Header"> <p><b>Response to Comment O6-3</b></p> </div> <div data-bbox="1066 872 2011 980" data-label="Text"> <p>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.</p> </div>

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<p style="text-align: right;"><b>Comment Letter O6</b></p> <p>Simply put, the County cannot allow more density to be built at the Wildland Urban Interface, in violation of the GP policies designed to protect public safety, beyond <i>the number of residents that can be safely evacuated on the existing road infrastructure</i>. The extensive analysis below demonstrates that this area, given the 2-lane road infrastructure, cannot accommodate another GPA beyond the already approved Harmony Grove Village. As such we request the County conduct a full analysis of the actual evacuation conditions, in a worst case scenario, similar to what we provided in Exhibit A, so that the full impact on public safety is properly disclosed. Anything short of verifying and validating the numbers in Exhibit A is robbing the decision makers and the public of the ability to make informed decisions.</p> <p><b>BROKEN AGREEMENTS</b></p> <p>The DEIR fails to acknowledge the historical context of this request for an Amendment to the General Plan. In order for decision-makers and the public to fully understand the impact of the project, it is important to add the context of its genesis, and the revised document needs to truthfully explain the setting for this request to amend the General Plan.</p> <p>Our community, starting in the early 2000's, worked proactively with County staff to come up with a sustainable, carefully crafted plan for our area that took into account our community's needs, but also balanced it against the need of the County to accommodate growth. In the plan that eventually resulted, after five years of onsite visioning workshops led by County staff and many hours of other community meetings, we agreed to compromise with the County to allow increased density in our area that more than doubled our population while still protecting the rural environment we cherish. The evidence of this good faith, collaborative effort, is found in the County presentation documents that are uploaded to the Dropbox location referenced in the</p> <p>This compromise was made with the understanding, embedded in the General Plan, that, in exchange for agreeing to more houses within a village boundary, our area would be protected from further density, through a series of down-zones of properties throughout Harmony Grove.</p> <p><b><i>"In the compromise process, we agreed to downzone our own properties to protect the community for years to come. It would be a massive breach of public trust and a violation of our own property rights to turn around and upzone the property in question."</i></b></p> <p>Our residents gave up opportunities to subdivide and profit from smaller parcel sizes in order to protect their way of life. In effect we agreed to a development (Harmony Grove Village) to save our valley from further encroachment <i>while limiting our own profit potential</i>. This agreement is embodied in our Community Plan, in the General Plan map and is documented, for example, in the Property Specific Requests staff report about this project (Exhibit B – SD7) where county staff writes: <i>"This Village boundary is the result of several public workshops that developed a compromise position to assign additional density within the Village boundary surrounded by Semi-Rural and Rural Lands."</i> We were given assurances by County staff and our supervisors that we would not have to take on any more growth. We did our part, accepted a lot of growth, downzoned many of our own properties, foregoing financial gain for preserving community</p> <p style="text-align: right;">2</p>	<p><b>Response to Comment O6-4</b></p> <p>The comments regarding <del>evacuation</del> current and post-Harmony Grove Village South (HGV South) Project <u>evacuation</u> 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 <del>EIR</del> Section 5.2.1.2. Please also see the Global Response to Adequacy of Emergency Evacuation and Access.</p> <p><b>Response to Comment O6-5</b></p> <p>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.</p>

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<p style="text-align: right;">Comment Letter O6</p> <p>character, and now we ask the decision makers to honor this agreement. This is a matter of public trust.</p> <p><i>During my tenure on the Board of Supervisors, the community of Elfin Forest/Harmony Grove worked in good faith with the County to preserve their little community. The community wisely compromised with the County and took its fair share of growth by accepting Harmony Grove Village while down-zoning their own properties and limiting their own profit potential. They did this to protect the community from being overwhelmed by unfettered development and destroying their way of life. It would be unconscionable for the County to renege on this agreement to benefit any developer, much less out of town and out state concerns."</i> June 2017, Pam Slater-Price, former Supervisor, County of San Diego</p> <p>Given the context, the applicant needs to justify why the County should renege on its compact with our community. What is the specific public interest served by asking for an amendment that rewrites our Community Plan and portions of the General Plan? A generic statement about lack of affordable housing in San Diego is not sufficient to permit full evaluation of the merits of the application. The General Plan has provisions for 72,000 pre-approved housing units that could be built without a GPA. How many HGVS proposed units would be "affordable"? What mechanism would be employed to ensure they stay that way? What has changed on the ground since August 2011 that makes this particular location one where the public benefit of creating more housing units exceeds the public harm of decreasing public safety by placing residents in harm's way? The DEIR is silent on these topics.</p> <p>This is especially important in light of the fact that according to the San Diego County General Plan, any change requiring a GPA "should be reviewed to ensure that the change is in the public interest and would not be detrimental to public health, safety, and welfare."</p> <p>In fact this request for an exception to numerous GP policies would be extremely detrimental to public safety, in that it renders evacuation in an emergency practically impossible to conduct in a safe manner. Please refer to Rahn Fire Report for details.</p> <p><b>PUBLIC HEALTH SAFETY AND WELFARE</b></p> <p><b>The DEIR Hazards and Hazardous Materials Cumulative Impact Analysis Finding of Less than Significant for Wildland Fire Hazards is Invalid and Must Be Readdressed Pursuant to a Reasonable Worst-Case Cumulative Evacuation Analysis.</b></p> <p>The DEIR Hazards and Hazardous Materials Cumulative Impact Analysis finding that "impacts from wildland fire hazards would be less than significant" (DEIR at 3.1.4-29) is invalid because it is not supported by objective evidence regarding the cumulative time to evacuate all the way to safety all residents and animals from the affected area, which includes Harmony Grove, Eden Valley, Hidden Hills and Elfin Forest, and is unreasonable because an analysis of cumulative</p> <p>3</p>	<p><b>Response to Comment O6-6</b></p> <p>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.</p> <p><b>Response to Comment O6-7</b></p> <p>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.</p> <p>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.</p>

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In addition adding upwards of 1,500 new residents at the Wildland Urban Interface increases fire ignition risk as studies have shown that 90% of wildfires are caused by human activity.</p> <p>Land use policy has a key role to play in protecting populations in high fire risk areas. Per Don Whittemore, a former assistant fire chief in Colorado who has studied wildfire behavior and is quoted by the New York Times in the context of the Portugal tragedy, “wildfires are a social problem, not an environmental problem. Placing high density development in the Wildland Urban interface exponentially increases the level of risk to both populations and to firefighters”.</p> <p><b>“S-1.1 Minimize Exposure to Hazards.</b> Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.”</p> <p>Country Club Drive would be the only safe egress for evacuation as per the Wildland Risk Analysis (14-15), a critical site-specific constraint in the high wildfire risk area which requires the County to minimize the population exposed to the hazard caused by the constraint as per General Plan Policy S-1.1. The Project as designed would exceed the current land use designations and density allowances for the site, resulting in a significant cumulative evacuation impact, as shown in the analysis described below, and, as evidenced by the impact, does not reflect the site specific evacuation egress constraints and hazards to property and residents posed by the consequent entrapment risk, exacerbating rather than minimizing exposure to hazards in violation of Policy S-1.1.</p> <p><b>“S-2.6 Effective Emergency Evacuation Programs.</b> Develop, implement, and maintain an effective evacuation program for areas of risk in the event of a natural disaster.”</p> <p>The Project site is in a proven area of high risk and the significant cumulative evacuation impact of the Project as described below would preclude development, implementation and maintenance of an effective evacuation program thereby causing the County to violate S-2.6 if the GPA is</p> <p style="text-align: right;">4</p>	<p><b>Response to Comment O6-8</b></p> <p>Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>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.)</p> <p><b>Response to Comment O6-9</b></p> <p>Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p>

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Require development to provide additional access roads when necessary to provide for safe access of emergency equipment and civilian evacuation concurrently.”</p> <p>In addition to the failure of the Project to provide an additional secondary access road in violation of policy S-3.5, the significant cumulative evacuation impact of the Project which would cause the time to evacuate the area to substantially exceed the time period of safe access to roads, while allowing for emergency equipment access under a reasonable worst-case scenario, would be a violation of S-3.5 because safe access for civilian evacuation would not be provided enough time to affect the evacuation of the entire area population of humans and animals. Simply widening 1400 feet of road immediately adjacent to the project does not allow the increased evacuation traffic to safely exit to safety on the one, two-lane, already compromised exit route (Country Club Drive North).</p> <p>“S-3.6 Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.”</p> <p>The HGVS development is located within a Very High Fire Severity Zone and, despite mitigation measures that may reduce risk of structural and human loss due to wildfire <i>within</i> the development, the Project would <i>increase</i> rather than reduce the risk of structural and human loss due to wildfire, particularly the risk of human loss due to entrapment, for potential HGVS residents and existing residents of the surrounding affected area in violation of General Plan Policy S-3.6 because the cumulative impact of the Project would cause the time to evacuate the area to substantially exceed the time period of safe access to the one safe egress road, Country Club Drive, per the cited Wildfire Risk Analysis, under a reasonable worst-case scenario.</p> <p><b>A Reasonable Cumulative Emergency Access Impact Analysis as Follows Must Be Done to Substantiate the DEIR Hazards and Hazardous Materials Cumulative Impact Finding and as a Basis for Evaluation of Project Compliance with General Plan Policies LU-6.10, S-1.1, S-2.6, S-3.5 and S-3.6.</b></p> <p>In order to properly analyze the cumulative evacuation impacts and General Plan Land Use and Safety Element Policy compliance of the Proposed Project in the DEIR, the County should employ as a basis for evaluation modeling the following components:</p> <ol style="list-style-type: none"> <li>1. an evacuation traffic flow analysis methodology such as that in the FPP;</li> <li>2. a realistic worst-case wildfire scenario;</li> <li>3. and reasonable population estimate counts for             <ol style="list-style-type: none"> <li>(a) the number of existing “legacy” dwelling units,</li> <li>(b) the number of potential dwelling units based on current zoning (build-out scenario), and</li> <li>(c) the number of potential total units including GPAs residents for the affected areas.</li> </ol> </li> </ol> <p>A realistic worst-case wildfire in the Project area would involve concurrent ignition points, (1) as illustrated in the Wildland – Urban Interface Fire Emergency Plan, Harmony Grove-Offshore</p> <p style="text-align: right;">5</p>	<p><b>Response to Comment O6-10</b></p> <p>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.</p> <p><b>Response to Comment O6-11</b></p> <p>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.</p> <p><b>Response to Comment O6-12</b></p> <p>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.</p>

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<p style="text-align: center;"><b>Comment Letter O6</b></p> <p>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):</p> <p>Existing = About 2 ½ hours, ½ hours less than the safe evacuation time limit</p> <p>Existing + Zoned Potential = Almost 5 hours, 2 hours more than the safe evacuation time limit</p> <p>Existing + Zoned Potential + Potential by GPA = About 6 ½ hours, 3½ hours more than the safe evacuation time limit</p> <p>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 HGVS to wildland fire hazards would be significant, the DEIR finding of insignificant impact 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.</p> <p>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 Country Club Drive between Mt. Whitney Road and Hill Valley Drive provided by MRO Engineers based on the Highway Capacity Manual, 2010 adapted to the conditions of Country Club Drive.</p> <p>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 Country 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 South and Valiano 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 Country Club Drive to safety beyond the Auto Parkway intersection.</p> <p>The DEIR completely fails to disclose any of the data points cited above as the basis for sound decision making.</p> <p>7</p>	<p><b>Response to Comment O6-14</b></p> <p>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.</p> <p><b>Response to Comment O6-15</b></p> <p>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.</p> <p>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:</p> <p><i>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</i></p>

COMMENTS	RESPONSES
	<p><i>cases, DAS and the OA EOC will coordinate and attempt to collocate animal shelters with people shelters.</i></p> <p>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.</p> <p>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.</p> <p><b>Response to Comment O6-16</b></p> <p>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.</p>



COMMENTS	RESPONSES
<p style="text-align: center;"><b>Comment Letter O6</b></p> <p>The County should also verify the hourly vehicle carrying capacity of Country Club Drive between Mt. Whitney Road and Hill Valley Drive based on the Highway Capacity Manual, 2010 as adapted to the conditions of the roadway, and determine the safe evacuation route use time window for the roadway based on the Harmony Grove-Offshore Forecast Fire Progression map referenced above. Once the County has obtained these data points, an analysis should be performed to determine the cumulative evacuation time for existing, potential zoned and potential by GPA densities, then compare these findings to the safe evacuation route time period as a basis for substantiation of a cumulative wildland fire project impact significance finding.</p> <p>Further, calculating the <i>maximum safe density limit</i> for the area which will allow for safe evacuation ingress and egress for the entire existing and zoned potential population of humans and animals in a worst-case wildfire scenario should be determined by such detailed analysis, and that density limit should be used as a basis of evaluation for the HGVS project and all projects in the area to ensure development density is “designed to protect property and residents from the risk of natural and man-induced hazards”, including the property and residents of affected neighboring communities, in compliance with General Plan Policy LU-6.10 as well as to ensure compliance with Safety Element policies S-1.1, S-2.6, S-3.5 and S-3.6.</p> <p>Failure to conduct such an analysis, or performance of the analysis using inaccurate data, or on the basis of an inferior worst-case scenario, would represent a failure of the County to exercise fundamental best practice disaster planning and, consequently, failure to properly provide for the safety of residents and failure to “ensure that development accounts for physical constraints and the natural hazards of the land” in violation of General Plan Guiding Principle 5.</p> <p><b>A CPEP or CWPP Committee Should be Established for the Project Area at the Direction of the County to Develop and Implement Effective Wildfire Hazard Mitigation Measures.</b></p> <p>As a proven effective measure to mitigate evacuation and other wildfire risks, the County should direct the San Dieguito community, which is primarily served by the Rancho Santa Fe Fire Protection District, to form a committee of public officials and local citizens to develop a community-wide Community Protection and Evacuation Plan (CPEP), or Community Wildfire Protection Plan (CWPP), in compliance with the Board of Supervisors resolution of January 2003.</p> <p>A CWPP has been developed for the Rancho Santa Fe portion of the San Dieguito community, and the Rancho Santa Fe Fire Safe Council which developed the CWPP for Rancho Santa Fe could serve as a basis for an extended committee which should include local citizens and other interested public agency representation from other parts of the San Dieguito community not currently members of the Rancho Santa Fe CWPP committee. The establishment of such a committee would provide the forum and organizational structure to evaluate evacuation risks in the area affected by the Proposed Project, leveraging considerable local knowledge and experience with many area wildfires, to develop an effective mitigation strategy for evacuation and other wildfire risks. The findings and mitigation strategy developed by the committee should then be used to provide a bona fide foundation for Project impact and General Plan policy compliance evaluation, findings and mitigation.</p> <p><b>The County Should Engage Federal Assistance to Ensure Best Practice Evacuation Risk Evaluation</b></p> <p style="text-align: center;">8</p>	<p><b>Response to Comment O6-17</b></p> <p>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.</p> <p><b>Response to Comment O6-18</b></p> <p>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 (<a href="http://firesafesdcounty.org/fsc-support/start-a-local-fsc/">http://firesafesdcounty.org/fsc-support/start-a-local-fsc/</a>) 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.</p>

COMMENTS	RESPONSES
	<p><b>Response to Comment O6-19</b></p> <p>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.</p>

COMMENTS	RESPONSES
<p style="text-align: right;"><b>Comment Letter O6</b></p> <p>As a further evacuation risk mitigation measure, the County should engage The National Academies of Sciences Engineering Medicine Transportation Research Board Standing Committee on Emergency Evacuation <a href="https://www.mytrb.org/CommitteeDetails.aspx?cmtid=4394">https://www.mytrb.org/CommitteeDetails.aspx?cmtid=4394</a> to perform an expert analysis of the evacuation risk and propose mitigation. With a national perspective on mass evacuation, the expertise, tools and resources of a federal agency, the NASEM TRB emergency evacuation committee would be in a position to perform a top level situational evaluation and potentially identify new mitigation measures based on their expertise. The results of their analysis should then be evaluated by the San Dieguito CWPP committee and be considered in the development of the community-wide CWPP and to provide additional substantiation for Project impact and General Plan policy compliance evaluation, findings and mitigation.</p> <p>Without these broader efforts to thoughtfully and carefully plan for housing outside the General Plan envelope, the public and the decision-makers do not have the information necessary to properly evaluate the real potential impacts of the proposed deviation from the General Plan.</p> <p><b>Fire concerns - exceeding dead end road requirement and no secondary egress</b></p> <p>In the DEIR, the Fire Protection Plan waives a key requirement intended to protect the safety of residents, both existing and new residents. The most egregious of these is a waiver of the 800 foot minimum dead end road requirement (503.1.3). The only mitigation acceptable for exceeding this requirement is providing secondary access (503.1.2). The FPP waives both the requirement and yet does not provide mitigation that would similarly allow for safe evacuation. Those of us who live on Country Club Road who watched 30+ houses burn and the oldest religious community in San Diego County destroyed during the Cocos fire are very concerned about the evacuation issues and the unsafe situation this proposed exception creates. The FPP states that there <i>is</i> a private road that could provide secondary egress should the main egress be blocked. However, this unimproved dirt road belongs to private landowners who have not given permission (nor been asked) for this use and furthermore, is unsuitable for emergency vehicle access and unlikely to support this many passenger vehicles and horse trailers exiting the area. Additionally, it goes through brush and other flammable habitat which makes it less suitable for evacuation during a wildfire event. Please provide evidence that a) there is a permission/easement to use this road, b) it is not obstructed and in fact, passable by vehicles, c) that it can safely accommodate 1800+ vehicles and horse trailers in a timely manner and d) that in the case that Country Club Road is blocked due to bridge failure, fire or other obstructions, residents would be able to evacuate safely and fire apparatus would be able to access the site.</p> <p>The FPP states that Country Club Dr. south of Harmony Grove Road will be widened to 3 lanes to increase the throughput during evacuation (1900 cars per hour / per lane). What it fails to mention is that this is only 1400 feet of road that will be improved and, upon crossing HGR, the traffic is funneled back to 2 lane roads (Country Club going North or HG Road in either direction) which will create a massive bottleneck. Only one of those roads (Country Club Dr.) will be available to evacuate per the HGVS Wildfire Risk Analysis conducted by Rohde and Associates on behalf of the applicant, so they cannot make an assumption that traffic will split into all directions at that intersection. During a fire event there will be only one evacuation route as one route will always be blocked due to the fire. During the Cocos Fire <i>both</i> HG Road and</p> <p>9</p>	<p><b>Response to Comment O6-20</b></p> <p>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.</p> <p>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 useable access way, but that would not strictly conform to the County’s roadway standards and a modification/variance would need to be granted.</p> <p><b>Response to Comment O6-21</b></p> <p>The comment presents conclusions from the Wildfire Risk Analysis (Rohde &amp; 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 &amp; 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):</p>

COMMENTS	RESPONSES
	<p><i>In contrast, the consultant staff and public safety officials who participated in the field tour of the site unanimously agreed that the site has 4 [sic] potential routes of egress during evacuation, two with strong viability. All participants expressed comfort that the proposed variance for the 800-foot single access road was acceptable.</i></p> <p>Please also see the Global Response to Adequacy of Emergency Evacuation and Access.</p>

COMMENTS	RESPONSES
<p style="text-align: center;"><b>Comment Letter O6</b></p> <p>Country Club Drive were blocked as the fire spread from the San Marcos area to the Eden Valley and Harmony Grove communities.</p> <p><b>Fire concerns - shelter in place not compliant - and at the expense of existing residents</b>  The FPP also states that the proposed project has a “shelter-in-place” (SIP) philosophy so that its residents would be safe during a wildfire event, though not SIP “status”. SIP only protects from ember ignition, not the fire front itself. Sited in a wildland urban interface (WUI) with permanent open space surrounding the project on at least two sides, the houses of HGVS are more likely to be overwhelmed by the fire front itself, not just the embers from said fire. In fact, during the Witch Fire, the fire front (not the preceding embers) caused a majority of the damage to structures (source: <a href="#">A case study of communities affected by the Witch and Guejito Fires</a>, US Department of Commerce). SIP compliant construction can withstand some ignition from embers, but a fire front that can radiate heat upwards of 2000 degrees incinerates everything in its path and is simply too hot to be extinguished by shelter-in-place residents with garden hoses.</p> <p>Regardless, even if the SIP philosophy may offer some measure of protection to the new residents, it vastly increases the risk encountered by the existing residents and community that has older construction with lower fire protection ratings than the newer buildings. The increased risk is several fold:</p> <p>a) it increases the density of housing in an area of low adjacent housing density and thousands of acres of <i>permanently preserved open space</i>, which increases the sources of ignition.</p> <p><b><i>“In areas with a low adjacent housing density, the likelihood of fires increases rapidly with additional density (i.e., increased ignitions)”</i></b> Mann ML, et al. (2016) Incorporating Anthropogenic Influences into Fire Probability Models: Effects of Human Activity and Climate Change on Fire Activity in California. PLoS ONE 11(4): e0153589. <a href="https://doi.org/10.1371/journal.pone.0153589">https://doi.org/10.1371/journal.pone.0153589</a></p> <p><b><i>“Scenarios with lower housing density and larger numbers of small, isolated clusters of development, i.e., resulting from leapfrog development, were generally predicted to have the highest predicted fire risk to the largest proportion of structures in the study area.”</i></b> Syphard AD, Bar Massada A, Butsic V, Keeley JE (2013) Land Use Planning and Wildfire: Development Policies Influence Future Probability of Housing Loss. PLoS ONE 8(8): e71708. doi:10.1371/journal.pone.0071708</p> <p>b) it decreases the ability for existing residents whose homes are not protected by SIP to evacuate due to increased road congestion, and</p> <p>c) the lack of secondary access in effect dooms the existing residents to being burned alive in their own homes in the very likely scenario (recently encountered during the Cocos Fire) that the main access on Country Club is obstructed by residents panicking and causing obstruction as they try to evacuate.</p> <p>Even our own Fire District states in their own documents, that secondary access in SIP communities is crucial: “It is important to have at least two ways out of your community, including secondary access routes. If all routes are congested, you would be safer in your home</p>	<p><b>Response to Comment O6-22</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p><b>Response to Comment O6-23</b></p> <p>Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>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</p>

COMMENTS	RESPONSES
	<p>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.</p> <p>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.</p> <p>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</p>

COMMENTS	RESPONSES
	<p>be a fire-adapted community with a strong resident outreach program that raises fire awareness among its residents.</p> <p><b>Response to Comment O6-24</b>  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.</p> <p><b>Response to Comment O6-25</b>  Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p><b>Response to Comment O6-26</b>  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.</p>




COMMENTS	RESPONSES
<p style="text-align: right;"><b>Comment Letter O6</b></p> <p>than being stuck in traffic trying to evacuate.” (<a href="https://www.rsfire.org/wp-content/uploads/2016/09/SIP_for_web.pdf">https://www.rsfire.org/wp-content/uploads/2016/09/SIP_for_web.pdf</a>).</p> <p>So the waiver of 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 their 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:</p> <ul style="list-style-type: none"> <li>• That the modification is in compliance with the intent and purpose of the code; and,</li> <li>• That such modification does not lessen health, life and fire safety standards.</li> </ul> <p>Source: <a href="http://www.sandiegocounty.gov/dplu/docs/Fire-Guidelines.pdf">http://www.sandiegocounty.gov/dplu/docs/Fire-Guidelines.pdf</a></p> <p>Please substantiate any claims that the FPP does not put existing residents at risk, does not significantly increase the risk of wildfires 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 exposure as was the case with recent fires in the County, as is likely due to the proximity and abundance of open space nearby. Please provide studies that show that SIP residents are likely to stay put rather than flee a fire and not create congestion on a 2-lane road such as Country Club as they seek to escape. Please provide substantiation that the clubhouse shelter being provided is enough to house all new and existing residents in the case of inability to evacuate. According to the FPP, the club house can hold 330 people, less than a fifth of the population of the proposed project and existing residents: describe what type of triage of other prioritization method will be used when panicked residents cannot evacuate and the fire front is upon them, as was the case in this very area only a few years ago.</p> <p><b>Fire Protection Plan and Potential Conflicts of Interest</b></p> <p>The FPP clearly states that the existing fire station at HGV has a funding gap and that this project will help close that gap.</p> <p><i>The approved fire station that will be built in Harmony Grove Village requires additional funding to cover annual operating costs. The HGV's project will provide fair-share funding which will help close the financial gap that currently exists.</i></p> <p>The DEIR seems to imply that the County has an incentive to approve a project in a High Fire Severity Zone, waiving crucial fire safety regulations where houses burned only 3 years ago, in order to correct an error that the County made in the first place. Please disclose the nature, amount and structure of the “financial gap”, and how it will be filled should this project not be approved.</p> <p><b>LAND USE</b></p> <p><b>Rewriting of our community plan to benefit the developer without corresponding public benefit or input</b></p> <p>The proposed changes to the Community Plan, made without any input from the community itself, are an insult and an affront to the hundreds of hours expended by community members</p>	<p><b>Response to Comment O6-27</b></p> <p>Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p><b>Response to Comment O6-28</b></p> <p>Please see the Global Response to Adequacy of Emergency Evacuation and Access.</p> <p>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.</p> <p>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.</p>

COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter O6</p> <p>involved in the process of developing the community plan prior to its adoption into the San Diego County General Plan. Many residents accepted a downzoning of their own properties, forsaking their own profit potential, as part of this compromise. What is the point of developing a Community plan in good faith with County staff, if an applicant can simply delete those portions they cannot comply with rather than adhere to the policies? These changes are proposed without any input from the community to benefit solely the developer. Under section H and under LU-2.2.1, the applicant attempts three times to erase the entire premise for accepting the original HGV development, namely to balance the number of rural homes with the number of urban homes so that the rural nature of our community is not overwhelmed by urban style development. Please show how having rural residents outnumbered 4 to 1 by urban/suburban development will help maintain the rural character and voice of our community. Just stating it does not make it so.</p> <p>The population of Harmony Grove is expected to increase dramatically as the Harmony Grove Village development pattern is built out. If the <del>pattern shown on the General Plan Land-Use Map is policies are strictly closely followed, the final number of urban homes should approximately equal the number of rural homes in the neighboring communities of Elfin Forest, Eden Valley, and Harmony Grove should be able to keep its rural voice.</del></p> <ul style="list-style-type: none"> <li>• <del>Urban homes must not outnumber the rural homes to maintain the rural voice must be maintained and preserve the rural heritage of this historic community must be preserved by the Community Growth policies outlined under Issue LU-2.2.</del></li> </ul> <p><b>Policy LU-2.2.1</b> Ensure that <del>the number of urban residences does not greatly exceed that of the rural residential uses and equestrian character of in the greater unincorporated communities of Harmony Grove and Eden Valley are maintained by adherence to the Community Plan policies set forth in Section 1.1 "Community Character."</del></p> <p>They also seek to strike any mention of the negotiations we had with the County in establishing these guidelines. There were many folks involved in that process including former and current members of the Board of Supervisors, former County staff and others, many of which are aware and will testify that these policies were implemented as part of a negotiation with the community, not simply adherence to existing General Plan policies. The applicant should provide proof that these policies were not a result of a negotiation with the community and also provide justification that changing these policies will not have an adverse effect on the existing communities (e.g. growth inducement, fire risk, increased traffic, reduced biological resources, community character). Otherwise, they may not strike out these references in the Community Plan.</p> <p>Supervisors. Residents will continue to work to preserve this historic 100-year-old community by implementing the Village Development Pattern <del>that—was negotiated consistent with General Plan policies.</del></p>	<p>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.</p> <p>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.</p> <p><b>Response to Comment O6-29</b></p> <p>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.</p> <p>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</p>

COMMENTS	RESPONSES
	<p>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.</p> <p><b>Response to Comment O6-30</b>  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.</p>

COMMENTS	RESPONSES
<p style="text-align: right;"><b>Comment Letter O6</b></p> <p><b>Baseline unit count needs to be reconciled</b></p> <p>Please reconcile how the baseline unit count of 220 was derived, since it is substantially different from the staff yield estimate if granted prior to the last entitlement of only 168-180, just prior to the Supervisors' vote on this Property Specific Request. See SD17 on staff report (Exhibit B) prior to supervisors' vote, stating (emphasis added):</p> <p>Nearly one-half of the property is constrained by steep slopes, is nearly entirely constrained by High and Very High Habitat Value, and within the Very High Fire Hazard Severity Zone. The VR2 designation is not supported by the Elfin Forest / Harmony Grove Town Council or the San Dieguito CPG. In addition, the property is outside the Harmony Grove Village boundary proposed in the San Dieguito Community Plan. <i>This Village boundary is the result of several public workshops that developed a compromise position to assign additional density within the Village boundary surrounded by Semi-Rural and Rural Lands.</i> The Harmony Grove Town Council and the San Dieguito CPG support the PCC / Staff Recommendation, which proposes a combination of SR2, SR4, and RL20 designation. Under this recommendation, the SR2 designation is applied to the area adjacent to the Harmony Grove Village where there is less steep slope. The RL20 designation is applied in the southern portion where there is the most steep slope and SR4 to the remaining areas. The applicant is requesting a compromise position of Semi-Rural 0.5, which would be the same base density, but would result in fewer units because of the slope restrictions. The following is an estimate of the potential dwelling unit yield under each of the alternatives:</p> <p style="padding-left: 40px;">Existing General Plan — 20 - 27 units PC / Staff Recommendation — 22 - 26 units Referral Map — 214 units <b>Property Owner's request (SR0.5) — 168 - 180 units</b></p> <p>Please note none of the options in front of the decision-makers included 220 units: please provide paper trail and evidence of how that calculation was derived. Since the supervisors voted in April 2011 on the basis of information showing 20% less units, please provide legal rationale that the public and decision makers were afforded full disclosure and analysis of the full project impact as approved.</p> <p><b>Lot sizes inconsistent with Equestrian Ranch across the street.</b></p> <p>As stated on page two of the staff scoping letter for Harmony Groves Meadows (a previous incarnation of this project on the same site) from 2007 (Exhibit C), small lot sizes are incompatible with the Equestrian Ranch right across the street, as follows (emphasis added):</p> <p>The Harmony Grove Village Specific Plan was recently approved by the Board of Supervisors. This project establishes a land use pattern for the Harmony Grove area with a Village Core surrounded by single-family residential development that decreases in density as distance from the Village Core increases. <i>In addition, the project site is adjacent to the east of the approved Equestrian Ranch. It does not appear that the design of Harmony Grove Meadows has taken into account these recently approved land uses. In particular, the minimum 4000 square foot lots would not be compatible with the approved Equestrian Ranch.</i></p>	<p><b>Response to Comment O6-31</b></p> <p>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.</p> <p><b>Response to Comment O6-32</b></p> <p>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.</p>



COMMENTS	RESPONSES
<p style="text-align: right;"><b>Comment Letter O6</b></p> <p>Please describe how this project is now compatible with that land use, and/or disclose the impact of and associated mitigation measures for not being compatible. <span style="float: right;">↑ O6-32</span></p> <p><b>A feasible alternative was not considered</b></p> <p>Please review the Harmony Commons Alternative, which meets all the Project objectives and is feasible as it amalgamates elements from DEIR alternatives deemed to be feasible. <span style="float: right;">↑ O6-33</span></p> <p>In conclusion, the DEIR needs to be recirculated to fully disclose the public safety impacts identified in this letter as well as the other impacts discussed in our previous 2011 letter to the Board of Supervisors regarding the literal gift of 200 units for the asking to the previous applicant. <span style="float: right;">↑ O6-34</span></p> <p>Respectfully submitted,</p>  <p>Jacqueline Arsivaud Board Chair, EFHGTC</p> <p>Exhibits:</p> <p>Attached:</p> <p>Exhibit A -- evacuation modeling Exhibit B -- PSR staff report Exhibit C -- 2007 scoping letter</p> <p>On Dropbox: Harmony Commons Alternative 2010 PSR staff report 2007 Harmony Groves Meadows scoping letter February 21, 2011 EFHGTC letter to Board re PSR SD7 County staff PowerPoint presentations, poster boards and land use maps from Harmony Grove visioning workshops <span style="float: right;">↑ O6-35</span></p> <p>14</p>	<p><b>Response to Comment O6-33</b></p> <p>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.</p> <p><b>Response to Comment O6-34</b></p> <p>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.</p> <p><b><u>Response to Comment O6-35</u></b></p> <p><u>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.</u></p> <p><u>Exhibit A: This exhibit includes an evaluation of build out the area in terms of evacuation during a wildfire. This 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.</u></p> <p><u>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.</u></p> <p><u>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.</u></p> <p><b><u>Dropbox:</u></b></p> <ul style="list-style-type: none"> <li><u>A complete response to the Harmony Grove Alternative is included in Responses to Comments O6-33 and O3a-50.</u></li> </ul>

COMMENTS	RESPONSES
	<ul style="list-style-type: none"> <li>• <u>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.</u></li> <li>• <u>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.</u></li> <li>• <u>This exhibit consists of the 2011 EFHGTC letter, submitted for a different project, Harmony Grove Meadows, and does not require further response.</u></li> <li>• <u>This exhibit is the County staff powerpoint on a different project, Harmony Grove Village (HGV), and is not applicable to the proposed project.</u></li> </ul> <p><b><u>Response to Comment O6-36</u></b>  <u>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.</u></p>

Response to Comment O6-36 – Fire Protection

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
FP-1	Johnston Road Exit	<b>Availability of Alternative Evacuation Route.</b> 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, <b>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.</b>	FPP	5.2.1.2 p.33	The comment suggests crossing private property in order to provide the applicant's upwards of 1500 residents emergency egress via an unimproved, unpaved path unsuitable for emergency equipment and anything other than a four wheel drive vehicle. The very notion that they are 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 egress via Country Club 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 very difficult terrain surrounded by highly volatile vegetation. This should be stricken from the document as infeasible, 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.	The County and Applicant take emergency access and egress seriously. The FPP and Project documents have been prepared in conformance with County and state requirements for CEQA evaluation. Emergency routes have been evaluated and conclusions comply with County and state requirements. Please refer to Global Response: Adequacy of Emergency Evacuation and Access for detail. The County and Applicant agree that grants of access by adjacent property owners may not occur. The Project functions without those easements, but if emergency personnel decide that traffic should be routed that way, they have the legal right to do so.
FP-2	Johnston Road access improved	<a href="#">Access for these residences will continue to be provided through the HGVS site after development, but via improved, code conforming roadways.</a> The existing road does not meet the fire code, varying in width, surface, and grade.	FPP	5.2.1.2 p.33	The applicant does not have permission to improve the existing easement on private property. Therefore it is cannot be said to be accessible via passenger vehicle.	The access that 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 on-site access would be upgraded from unpaved dirt roads to improved paved roads within HGV South Project boundaries.
FP-3	Secondary access contradiction	<a href="#">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.</a> However, extensive analysis has determined that both of these secondary access routes are infeasible. <b>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</b> that can meet the strict definition of the code.	FPP	5.2.1.2 p.32	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 HGV	<a href="#">HGVS is effectively an extension of the Harmony Grove Village (HGV), which is located immediately contiguous (west and north) of HGVS and is currently under construction</a>	FPP	5.2.1.2 p.32	This is incorrect. HGV is a village centered development with higher density at its village core which feathers 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. HGV 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.	HGV 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. 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	<a href="#">HGV includes conversion of a large portion of the valley (project area is 500 acres and 742 homes) to low flammability, urban landscapes</a> and forms a fire break for HGVS as well as providing multiple fire safe evacuation routes and potential temporary refuge areas for HGVS residents.	FPP	5.2.1.2 p.32	Please provide substantiation that the houses at HGV have low flammability. Also please substantiate, showing specific studies, which show that urban environments form fire breaks and that they specifically decrease fire risks. Given that 90% of wildfires are started by humans (National Park Service, US Department of Interior), the cumulative increase in human activity of both developments (742 houses in HGV and the 543 in HGVS) would naturally increase the odds of fires starting significantly. That they are allegedly composed of material of low flammability, is inconsequential given that the risk of igniting the surrounding landscape with its high fuel loads is greatly increased. Even if HGV were considered a fire break (with substantiation) there is the issue of a riparian and wildland area in between the two developments which can serve as a channel for fire to travel and in fact, fire traveled through and jumped over the creek during Cocos fire due to the high fuel load of native and nonnative trees which are NOT adapted to fire. This is not to mention that the entire project is surrounded by native and nonnative wildlands on the other sides. Coco's fire burned down 20+ houses immediately adjacent to the proposed site and the fire did not come through the HGV "fire break," but rather from the West. Fires are more likely to come from the 1000s of acres of permanently entitled open space immediately south and east of the development anyways.	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 the Project elements contributing to the fire-resistive nature of the Project, as well as why Project elements would contribute to breaking fire paths from the south or east. The orientation of the Cocos 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 lost "immediately adjacent" to the Project is assumed to be a reference to the residences in the Harmony Grove Spiritualist Association, 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	<a href="#">HGVS 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.</a> HGVS, 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 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 errant embers. It does not make the houses impervious to the fire front itself. Sited adjacent to a wildland urban interface (WUI) with permanent open space, brush and chaparral surrounding the project an at least 2 sides, the houses of HGVS 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 density developments; in fact it was designed for rural and semi-rural density areas. In	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 light 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 FMZs are provided and considered by all reviewing



Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
					fact, during the Guejito/Witch Fires, the fire front (not the preceding embers) caused a majority of the damage to structures in a similar community, The Trails, on the edge of Rancho Bernardo, where 74 homes were destroyed. (Source: "A case study of communities affected by the Witch and Guejito Fires", US Department of Commerce). SIP compliant construction can withstand ignition from embers which is an effective measure, but a fire front that can radiate heat upwards of 2000 degrees incinerates everything in its path and simply causes combustion of interior building components as the fire resistant exterior heats up. It is simply too hot to be extinguished by shelter-in-place residents with garden hoses. And siting a high density development on land immediately adjacent to thousands of acres of protected open space, SIP will have a limited effect.	agencies and the acceptance agency, Rancho Santa Fe Fire Protection District (RSFFPD), to provide adequate setback and protection from potential heat generated from off-site fuels.
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.	<a href="#">HGVS 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. HGVS, 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.</a>	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 wildfire 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 homeowners are facing due to lack of secondary access and houses that are not hardened to SIP standards. Please include mitigation that that covers 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.	The Project includes all of the fire safety features found in shelter in place communities, but does not claim this official status. However, the site would be available for temporary on-site sheltering similar to any new master planned community in San Diego County. Existing residents who do not evacuate in a timely fashion potentially would be directed to shelter at HGV South or HGV by fire emergency personnel, and as addressed in Global Responses: Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.
FP-8	Shelter in place will not reduce the evacuation traffic volume to make it efficient and safe.	<a href="#">HGVS 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. HGVS, 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.</a>	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 this 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 ("Fewer 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.	<a href="#">HGVS 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. HGVS, 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.</a>	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 at least two ways 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.rsf-fire.org/wp-content/uploads/2016/09/SIP_for_web.pdf).	The comment is noted. The RSFFPD has concluded that the proposed modification to the dead end road length standard is allowable oh the HGV South project site based on its unique site features; including the short distance from the Project's entrances 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.	<a href="#">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.</a>	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 structures along the WUI. Please explain how EXISTING rural residents will be protected by the significant potential for civilian entrapment that will inevitably occur? The entire premise of the FPP and the studies is predicated on protecting the new residents but does nothing to protect the existing residents and, actually puts them more at risk of entrapment due to evacuation congestion.	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 Impacts Hazard Analysis and Adequacy of Emergency Evacuation and Access regarding roadways, existing and planned growth, etc.
FP-11	Summary: Shelter in Place philosophy is inadequate mitigation for no secondary access, and waiving the dead end	<a href="#">HGVS 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. HGVS, 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.</a>	FPP	Summary of Findings and Mitigation for this Project , p.34, point 6	<p>So the waiver of 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 their 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 <b>does not lessen health, life and fire safety standards</b>. Source: http://www.sandiegocounty.gov/dplu/docs/Fire-Guidelines.pdf</p> <p>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 exposure as was the case with recent fires in the County, as is likely due to the proximity and abundance of open</p>	The finding that the modification would not "lessen health, life and fire safety standards" was explicitly made by fire officials with jurisdiction.

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
	road requirement				space nearby. Also, please provide studies that show that SIP residents are likely to stay put rather than flee a fire and not create congestion on a 2 lane road such as Country Club as they seek to escape (the above mentioned report contradicts this claim). Also, please provide substantiation that shows that the clubhouse shelter being provided is enough to house all new and existing residents in the likely case that the one evacuation route is blocked. According to the FPP the club house can hold 330 people, less than a fifth of the population of the proposed project and existing residents.	
FP-12	Underfunded fire station	<a href="#">The HGVS project will provide fair- share funding through assessments, taxes, etc. which will help to close the financial gap that currently exists.</a>	FPP	Section 6, p.51	Please provide proof that there is a financial gap in funding. Additionally, the very reference to this gap in funding in the DEIR creates a significant conflict of interest between needing to help the County financial problems and having that same County be responsible for approving fire protection plans for these projects, especially those requiring controversial variances to critical fire code requirements.	At the time the FPP was prepared, a financial gap appeared to exist. However, when RSFFPD assumed jurisdictional authority of the area, financial arrangements between the RSSFPD and the County resolved the presumed gap. The reference to the potential gap has been deleted from the FEIR (see Section 3.1.8). Regardless, there was not and is not a correlation between funding and decisions as to how a project complies with the Fire Code. The RSFFPD submitted a Facility Availability Form for the Project indicating its ability to serve the Project, with no noted Conditions. Please also note that there is no variance being granted for the Project. Rather, a request for a modification from Section 503.1.3 of the CCR with respect to dead-end road lengths was accepted by the Fire Code Official. The Fire Code Official may grant a modification from such requirements pursuant to CCR Section 96.1.104.8. A modification may be granted when the modification is in compliance with the intent and purpose of the code, and such modification does not lessen health, life, and fire safety requirements. The Fire Code Official granted the Project a modification from the dead- end length requirements of the CCR based on the findings that are described in Section 5.2.1.2 of the Project's FPP (Dudek 2016). Secondary access was also thoroughly evaluated within the Project's FPP (Dudek 2016), the Wildfire Risk Analysis report (Rohde & Associates 2016), and by SDCFA, RSFFPD, and the County. As described in the FPP and FEIR Section 3.1.3, the Project would provide alternative fire protection features that are site specific and are designed specifically to address both the modification from the dead-end road length requirements and the secondary access constraints of the site. The Project is providing emergency access/egress through a code-adequate approach that is equivalent to secondary access (another code-adequate approach). The Project provides 25 measures that result in a system of fire protection and vehicle movement facilitation that has been found to justify the modification finding.
FP-13	Safety zones for legacy residences	<a href="#">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 egress 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.</a>	Rohdes, HGVS Wildfire Risk Analysis study	p.17, point 10	I can assure you that existing residents will not see the proposed development site itself as an opportunity for refuge. Please provide evidence that any residents, much less most residents, will view the proposed development site as an opportunity for safe refuge.	The Project can provide temporary refuge if requested to do so by fire emergency personnel. If individuals directed to shelter there choose not to do so, the Project is not able to force them to do so. The HGV South residents will be aware of their options, including temporary sheltering on site, due to the outreach required by the FPP and Evacuation Plans. These documents include a robust education component, including ongoing outreach for resident awareness which has been shown to result in a public that follows direction (provided by the Project's Evacuation Plan).
FP-14	3 lanes for evacuation	<a href="#">Country Club Drive Designed To Include Three, 12-Foot Travel Lanes. Country Club Drive would be widened from its intersection with Harmony Grove Road to the southernmost HGVS project entrance to three 12 foot wide travel lanes (Appendix E) which would compensate for lack of secondary access by providing additional capacity for evacuation</a>	FPP	Summary of Findings and Mitigation for this Project , p.33, point 2	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 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, if 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 already is paved to three-lane width north to the vicinity of Mt. Whitney Road (north of HGV), and has right-of-way of varying width north of there, although only two lanes are paved. The Rohde study was commissioned by the County and is not an Applicant-funded report. 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 Village Parkway or Kauana Loa Drive.
FP-15	Evacuation: HG Road going East crosses HGV Parkway - need for traffic control	<a href="#">Country Club Drive Designed To Include Three, 12-Foot Travel Lanes. Country Club Drive would be widened from its intersection with Harmony Grove Road to the southernmost HGVS project entrance to three 12 foot wide travel lanes (Appendix E) which would compensate for lack of secondary access by providing additional capacity for evacuation</a>	FPP	Summary of Findings and Mitigation for this Project , p.33, point 2	It should be noted that Harmony Grove Village road heading east crosses Harmony 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 (the 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.	Law enforcement and emergency management personnel manage evacuations. Attempts to model specifics of evacuations are problematic due to the fluid nature of evacuations. Pre-planning for these events occurs and prioritizes situational awareness and control of traffic flow by law enforcement and other emergency response personnel. Pre-planning includes contingencies should certain routes not be available during an evacuation. The hypothetical scenario described in the comment would be responded to in the same manner as any other unforeseen event. Adaptive management techniques would be employed with a prioritization of moving traffic that is considered at highest risk through traffic control measures.
FP-16	Dead end road length	<a href="#">The 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</a>	FPP	p.22	The applicant is measuring the dead-end road from the HG Road and Country Club intersection to the most distant point in the development. It does NOT take into account	The point from which 800 feet pertains is misunderstood by the commenter. The study reflects 800 feet to the closest three-lane roads, which are provided on Project.

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
		Drive, the first opportunity to travel in at least two separate directions.			the most distant point beyond the development which is slightly more than 1 mile (approximately 5280 feet). Please study this, revise or address accordingly.	
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 du.	WUI http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/hgvs/Harmony%20Grove%20Village%20South%20Public%20Review/PDS2015-GPA-15-002-WUIFERP_v3.pd	p.2	There are a number of major issues with the assumptions as presented, starting with the number of structures at 735. Just 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 Valiano (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 DR as evacuation	Under "primary evacuation plan", the report states "Move North Via Country Club Drive as the primary route"	WUI http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/hgvs/Harmony%20Grove%20Village%20South%20Public%20Review/PDS2015-GPA-15-002-WUIFERP_v3.pd	P2	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 78 will create a bottleneck at the intersection with Country Club Drive. Note that Valiano 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 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. 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	3.1.9-1	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 issued in March 2017 (Huff 2017: pers comm.)	Public Services section	3.1.9-2	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 to EFHGTC 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.

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
	approve Project to fill a "known gap" in County finances	<a href="#">cover annual operating costs. The HGV South Project would provide fair-share funding to help close the financial gap that currently exists.</a>			SDCFA 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 "gap" 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 "gap" 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.	



Comment O6-36

Response to Comment O6-36– Hazards

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
H-1	Project description is not adjacent to HGV	This site (listed as “Harmony Village Grove” in the updated records review) is located on the portion of the HGV project north of Harmony Grove Road, and is approximately 375 feet northwest of the Project site at its closest point.	Hazards	3.1.4-5	This clearly states that the Project is NOT adjacent to HGV, as claimed elsewhere in the DEIR to try to convince readers it can qualify as a village extension.	The Project is contiguous/adjacent to HGV. This text is pinpointing a physical location, which is sited within the existing HGV development footprint. The phrasing indicates that the hazardous materials site is not close enough to developable portions of HGV South to constitute an issue of concern.
H-2	Identification of FAHJ inconsistent throughout document	The Rancho Santa Fe Fire Protection District (RSFFPD) is the Fire Authority Having Jurisdiction (FAHJ).	Hazards	3.1.4-7	Elsewhere in DEIR SDCFA is listed as FAHJ - confusing to reader and possibly misleading. Correct throughout for consistency.	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 3.1.8 has been updated.
H-3	Missing analysis	Three off-site vegetation communities (coast live oak woodland, Diegan coastal sage scrub, and southern mixed chaparral) were identified as potentially facilitating fire spread toward Project residences.	Hazards	3.1.4-8	How about impact on <i>existing</i> residences? How will Project affect fire spread outside Project footprint? Will change in topography, installation of fire walls at top of slope adjacent to existing residences, or any other modification to current situation in any way impact hazards for existing residents?	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.
H-4	Deficient model used	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.	Hazards	3.1.4-8	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.	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.
H-5	Missing analysis of evacuation risk	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 arching).	Hazards	3.1.4-9	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?	Please refer to responses regarding evacuation in the Fire Protection portion of these comments, above.
H-6	Contradictory statements as to characterization of fire behavior	The FPP concluded that given the climatic, 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.	Hazards	3.1.4-9	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.	As stated in the EIR on the page cited in the comment, the difference is that HGV is building out, and the Santa Ana-driven winds come from the north in this area. With the HGV development, fire would not approach from the village area across native fuels.
H-7	More samples needed in ESA Phase II	The Phase II ESA (Appendix K-3) detected arsenic in 18 of the 21 shallow soil samples at concentrations up to 2.6 milligrams per kilogram (mg/kg).	Hazards	3.1.4-17	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.	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 3.1.3-17: "Cal/EPA generally does not require cleanup of soils to below background levels." No additional testing is required.
H-8	WTWRF location incomplete	The Proposed Project includes a WTWRF that would be located in the northern-most portion of the Proposed Project. The on-site WRF would be located a minimum of 315 feet from the closest on-site planned residence, approximately 930 feet from the closest HGV residence north of Harmony Grove Road, and approximately 1,250 feet from the nearest existing off-site residence to the east. Each of these existing or planned residences is or would be at higher elevations than the WTWRF. Schools are located at even greater distances. The closest identified school is Del Dios Middle School off West 9th Avenue, approximately 1.75 miles as the bird flies. This type of land use could require the handling and storage of hazardous materials for operations.	Hazards	3.1.4-18	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 "the handling and storage of hazardous materials for operations". Also, please correct this sentence to clarify meaning: "This type of land use could require the handling and storage of hazardous materials for operations." Is this type of land use appropriate, or would it "require" something else?	<p>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:</p> <p><i>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.</i></p> <p>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</p>

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
						EIR section. No revisions are required.
H-9	Determination of significance flawed	A significant impact to public safety or the environment would occur if: 8. The project cannot demonstrate compliance with all applicable fire codes.	Hazards	3.1.4-19	The Project is asking for an exemption to several fire code requirements: maximum dead end length (exceeded by a factor of 5) and secondary exit (Section 503.1.3 requirements). As such it is not compliant, especially in light of the conflict of interest noted elsewhere about financial interest of FAHJ.	The Project is compliant with the Fire Code, as detailed in Global Response: Adequacy of Emergency Evacuation and Access and as additionally discussed in this matrix under the category of Fire Protection. Similarly, there is no conflict of interest. Please see the response addressing item 22 of the Fire Protection comments.
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.	Hazards	3.1.4-20	This modification in no way impacts the ability of <b>outside</b> residents to evacuate if CC Drive gets clogged by traffic or becomes impassable due to fire or bridge failing in an earthquake. Please discuss how the 60 to 75 residences beyond the project will be in any way affected by this measure, and how evacuating Project traffic will impact their ability to evacuate.	Please refer to responses regarding evacuation in the Fire Protection portion of these comments, above. The Project would provide improvements to Country Club Drive benefiting all residents south of the creek, during routine day-to-day travel and during emergency access/egress. The improved road would contain three standard travel lanes and a three-lane bridge rather than a narrow at-grade crossing.
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 FPP concludes that the Project meets the intent of the code through a layered and redundant fire protection and evacuation system.	Hazards	3.1.4-21	No modeling of evacuating traffic all the way to safety is included in the DEIR. Analysis stops at intersection with Harmony Grove road, where Rohde report deems only ONE route to be safe (CC Drive North). Please provide modeling of evacuation including all planned projects on CC Drive to calculate the chances residents would be able to get to safety at all, and how long it would take. Please include in the simulation the horse trailers - outgoing and incoming which service the majority of existing residences; model should assume 100% of existing homes have large animals to evacuate, since that is what they are zoned for.	Please refer to responses regarding evacuation in the Fire Protection portion of these comments, above, and in particular the response addressing item 18 of the Fire Protection comments.
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 HGV properties.	Hazards	3.1.4-21	Project only discloses enhancements on a very small portion of CC Drive, from Project to intersection with Harmony Grove Road. As stated currently the enhancement would leave HGV residents completely unaffected in their ability to evacuate, as well as HG existing residents largely. Restate to correctly disclose scope of enhancement. In addition, Project should study constructing 3 lanes for the entirety of CC Drive all the way to safety to Nordahl, given that it is in fact "the only north-south circulation element providing ingress and egress", and since Project proposes to further burden it with new residents that option should be studied.	Please refer to the response addressing Fire Protection item 18 regarding Country Club Drive in the Fire Protection portion of these comments, above.
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 RSFFPD and the Applicant.	Hazards	3.1.4-22	Disclose the terms of the agreement made for the public to fairly evaluate if a conflict of interest exists.	No conflict of interest results from providing participatory funding in a Community Facilities District. It simply ensures that the Project contributes funds adequate to address its potential impacts.
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 <b>Project resident</b> evacuation in a wildfire emergency.	Hazards	3.1.4-22	No discusson of impact on existing residents ability to evacuate of 1,500+ additional people evacuating in an emergency.	Please refer to responses regarding evacuation in the Fire Protection portion of these comments, above.
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, <b>offer a means of equivalent egress</b> , and provide contingency planning if evacuation from the site is considered unsafe.	Hazards	3.1.4-22	Building 3 lanes to an intersection which then leads to a 2-lane road already operating at LOS D is NOT an "equivalent egress" to a secondary egress route. Please model evacuation all the way to safety, beyond the first intersection. Please model CCdrive North being impaired or bridge failing in an emergency: where do the residents outside the 330 people capacity of the shelter in place community building go? How about those trapped behind the project whose homes are not built to Shelter in place standards?	Please refer to responses regarding evacuation in the Fire Protection portion of these comments, above. Potential failure of the Project bridge is speculative and does not require analysis.
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 Arizona crossing at Escondido Creek would provide year-round access where historically, the roadway can be flooded.	Hazards	3.1.4-22	It is unlikely that a wildfire evacuation would take place when the crossing would otherwise be flooded - delete this statement in the context of meeting fire code as it does not address the topic at end of wildfire evacuation. Further, discuss new hazard created by elevated bridge potentially subject to compromise in case of an earthquake and trapping residents, vs the Arizona crossing currently in place which does not pose any such risk.	Comment noted. The statement regarding safety improvements provided by the bridge during flood events has been deleted from the cited discussion (focused on fire). Potential failure of the new Project bridge (built to current earthquake standards) during earthquake is speculative and does not require analysis.
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 communities (...) <b>providing a last resort for potential temporary refuge if early, safe, evacuation is not possible</b>	Hazards	3.1.4-23	The RSSFFD does NOT consider HGVS as a shelter in place community - see letter from district to EFHGTC dated April 27, 2017. Further, only 330 residents could shelter in the community building. Remove this statement or disclose the ways in which it differs from those communities with that official status.	The Project is not identified as a shelter in place community. Built to the same standards, however, it can operate as a temporary refuge if emergency personnel so direct its use. This is also true of HGV.
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.	Hazards	3.1.4-23	Add the caveat that these residences woul have to contend with the 2,000 cars from HGVS in front of them in order to evacuate themselves. In fact egress would be severely compromised vs. current conditions for existing residents and DEIR fails to fully discose that impact throughout.	Please see Global Response: Adequacy of Emergency Evacuation and Access, as well as responses regarding evacuation in the Fire Protection portion of these comments, above.

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
H-19	Misleading statement as to condition and availability of emergency egress route.	Additionally, a route to the east is accessible by typical passenger vehicles, does connect with Johnston Road to the east, and would be available in an emergency situation where people needed to be moved to the east and the primary access route (Country Club Drive) was not available. (...) These three ingress/egress points are in addition to the existing evacuation route to the east noted above, and would enable resident evacuation without compromising emergency respondent access to the community.	Hazards	3.1.4-23	This is completely false and misleading: the "road" described is a trail which is not passable by street vehicles, has several private gates without Opticom and other obstructions like vegetation and boulders, the Project does not have easements on private properties allowing for egress on these private properties even if it were feasible, which it is not under current trail conditions. This statement needs to be deleted or the full impacts of constructing a road disclosed, including impact to Coastal Sage Scrub habitat, acquisition of easements, aesthetics and noise impacts of road construction, archeological or historical resources assessment and disclosure.	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.
H-20	Misleading statement about egress points	The Project would provide three separate access ways off of Country Club Drive (Figure 3.1.4-1).	Hazards	3.1.4-23	The three egress points all lead to the same road, which continues as a 2-lane road without shoulders past the project. Please clarify the condition of the egress route from those points.	The County disagrees that the statement is misleading. It simply notes that three separate Project access points are provided off Country Club Drive. This agrees with the comment that the three points lead to the same road. It is true that 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 evacuation in the Fire Protection portion of these comments, above.
H-21	Additional exemptions from Code sought	For lots where a full 30-foot setback would not be possible, installation of a 6-foot tall, non-combustible, heat deflecting, wall would be provided as part of Project Design for additional heat and flame deflection.	Hazards	3.1.4-23	Given the scope of the exemptions already contemplated, no further deviation from strict application of code should be entertained. Modify project so there are NO lots that cannot meet standard setbacks given intense fire risk.	This is not necessary. Inclusion of a wall or set back are equivalent measures relative to fire safety.
H-22	Lack of disclosure of introducing new safety risk	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.	Hazards	3.1.4-24	Disclose any increased risk to existing residents finding themselves on other side of these proposed walls: what would be fire and flame behavior as it is deflected? Could embers or flames be more likely to fall back on existiung residences below at the top of the new proposed slope? How would modifying topography to create these lots impact fire behavior as it relates to existing residences?	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 dangers approaching from the east as it would provide an irrigated 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 wildfire behavior patterns in and of itself and there would be no increased risk to existing homes from the proposed design.
H-23	Lack of disclosure of impacts of internal ignition sources on project open space	The internal Project development area between residential structures and building clusters (see green portions of Figure 3.1.4-1) would be cleared of vegetation and re-planted with permanently irrigated fire-resistant plants, thereby excluding native fuels within the development area and minimizing the likelihood of ignitions internal to the Project.	Hazards	3.1.4-24	This does not discuss whether Project residents will have access to the onsite biological open space and possibly become an ignition source themselves. Will access to bio o/s be fenced off from new residents? Describe how these new potential ignition sources will be kept off native areas within the project footprint. How will the fencing affect the viability of the habitat meant to be conserved? Will trails exist through any of the bio o/s?	The EIR describes planned improvements to the existing primitive trail extending though the Project to Del Dios Highlands Preserve -- which trail would remain primitive in nature. Located toward the western edge of the Preserve, the trail would not affect viability of preserved habitat. The fencing is provided to protect the habitat, as described in Subchapter 2.3, Biological Resources. Whether the trail is used by Project residents or by other area residents, the fencing along it, and along the development edge, would restrict people and their animals (dogs and horses) from wandering through the open space. This will reduce human activity in the area. Although trail users are not identified as a significant source of ignition in the FPP, keeping them on the trail and out of adjacent open space would be an improvement over the existing condition.
H-24	Clarify limited scope of measure	the Project would eliminate the potential for roadway obstructions.	Hazards	3.1.4-25	Add "within the project". Parking will do nothing to avoid or prevent likely roadway obstruction by evacuating traffic outside project footprint.	Review of the entire paragraph shows that it is clear that the paragraph is addressing on-site parking and roadways. No additions to text are necessary.'
H-25	Proposed additional mitigation for increased evacuation risk due to Project	Based on its location and ember potential, the Project is required to include the latest ignition and ember resistant construction materials and methods for roof assemblies, walls, vents, windows, and appendages, as mandated by San Diego County Consolidated Fire and Building Codes (Chapter 7A and 2014 CCFC). Exterior walls would have a noncombustible covering. Ember resistant vents (BrandGuard, O'Hagin, or similar approved vent of 1/8-inch screening) would be utilized in all structures. Multi-pane glazing would be required with a minimum of one tempered pane, fire-resistance rating of not less than 20 minutes. All habitable structures and garages would be provided interior residential fire	Hazards	3.1.4-26	Since project will be impairing the evacuation of the 75 residences located behind it on a dead-end road, the applicant should be required to provide similar hardening of existing residences so their inhabitants have a better chance of surviving a wildfire in the likely scenario where their only egress is compromised by Project residents. EIR should require as mitigation that applicant install at their cost sprinkler systems, replace windows with multi-pane glazing, and replace existing vents with ember-resistant models as prescribed.	The County disagrees with the contention that the Project would impair evacuation of existing residences. No improvements to existing structures are required.



Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
		sprinklers per County Consolidated Fire Code requirements.				
H-26	Incorrect and unsupported conclusion	Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death from wildland fires	Hazards	3.1.4-26	Except for those located beyond the project who may be unable to evacuate because of the project. Simulation and full 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.	The County disagrees that existing residents "beyond the project" would be "unable to evacuate because of the project." 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.
H-27	Documents missing require resetting of public review period	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.	Hazards	3.1.4-27	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.	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.
H-28	Incorrect and misleading conclusion	With implementation of the corresponding fire protection Project features, including conformance with building and fire codes, 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.	Hazards	3.1.4-28	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.	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.
H-29	Inconsistent population estimates	A development like HGV South would typically include a demographic that results in fewer calls, per capita. Using San Diego County fire agencies' calculated 82 annual calls per 1,000 population, the Project's estimated 1,410 residents (calculated based on 3.12 persons per dwelling; SANDAG 2013)	Hazards	3.1.4-28	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.	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.

Response to Comments O6-36 – Traffic

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
T-1	Harmony Grove Road, Elfin Forest Road and intersection of Elfin Forest Road/ San Elijo Road omitted from TIA	The study area was based on the criteria identified in the County of San Diego's Report Format & Content Requirements: Transportation & 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)."	Appendix D Traffic Impact Analysis, 3.0 Existing Conditions, 3.1 Study Area	7	The forecast project + cumulative project peak hour volumes transiting Harmony Grove Road west of Country Club Drive, as derived from the HGVS TIA figures 3-2, 7-2 and 8-1, are as follows: westbound = 148 AM / 185 PM; eastbound = 141 AM / 153 PM. These peak hour volumes substantially exceed the 25 peak hour trip criteria specified by the County of San Diego for traffic assessment inclusion. Because the peak hour volumes exceed the 25 peak hour trip threshold, and because the vast majority of the peak hour traffic will impact the entire length of Harmony Grove Road west of Country Club Drive and Wilgen Drive, Elfin Forest Road, and the intersection of Elfin Forest Road / San Elijo Road, these mobility elements have been erroneously omitted from the TIA and DEIR, precluding reasonable analysis of the full extent of the direct and cumulative impacts to the excluded mobility elements which are likely to be significantly impacted by the project and cumulative project traffic volumes. Please note that these roadways as well as the intersection of San Elijo Road / Rancho Santa Fe Road were included in the Harmony Grove Village TIA, and such inclusion is a precedent for inclusion of these important mobility elements in the traffic analysis for the other GPAs in the same Harmony Grove/ Eden Valley area as Harmony Grove Village, HGVS and Valiano, and would similarly impact these mobility elements. Additionally, the impact to other downstream intersections such as San Elijo Road / Melrose Drive and Melrose Drive / Ranch Santa Fe Road should be evaluated and included in the HGVS traffic analysis if these impacts meet County guidelines for inclusion. Furthermore, the omission of these mobility elements from the HGVS TIA precludes consideration of a potentially unmitigatable significant impact to the Elfin Forest Road/San Elijo Road intersection which extremely congested during peak hours under existing conditions and may be reasonably expected to be significantly impacted with the added peak hour volumes caused by the project and cumulative projects. The potential that the City of San Marcos may be entitled to impact fees as a consequence of the impact should be addressed. Other impacts to consider and mitigate would be additional traffic on private roads; noise impacts to residents in close proximity to Harmony Grove and Elfin Forest Roads; increased hazards to recreational users of the roads including hikers, cyclists and equestrians; and, most critically, increased risk to emergency evacuees caused by evacuation traffic volumes dramatically exceeding roadway and intersection capacities which may result in substantial numbers of entrapped evacuees and consequent catastrophic loss of life.	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 that 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.
T-2	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.	Appendix D Traffic Impact Analysis, 3.0 Existing Conditions, 3.3 Existing Traffic Volumes, Table 3-1 Existing Traffic Volumes	13	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.	<p>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.</p> <p>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</p>

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
						<p>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.</p> <p>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.</p> <p>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.</p>
T-3	The cumulative traffic volume for Country Club Drive between Hill Valley Drive and Kauana Loa Dr is substantially understated in the HGVS TIA. The corrected volume exceeds the capacity of the roadway by 15%, yielding a LOS F rating and rendering unreasonable the expectation for installation of a northbound left turn lane at Eden Valley Lane to effectively mitigate the unacceptable service level to less than significant with a consequent probable re-rating of the impact to significant unmitigatable.	TABLE 9-2 NEAR-TERM STREET SEGMENT OPERATIONS: County of San Diego Street Segments: Country Club Drive: 7. Hill Valley Dr to Kauana Loa Dr: Existing Capacity (LOS E): 9700. Existing: ADT 5980, LOS B. Existing + Project: ADT 7105, LOS C, Change n/a. Existing + Project +Cumulative Projects: ADT 9385, LOS E, Change 1125. Impact Type: Cumulative	Appendix D Traffic Impact Analysis, 9.0 Analysis of Near Term Scenarios, 9.3 Existing + Project + Cumulative Projects Conditions, Table 9-2 Near-Term Street Segment Operations	49	The Country Club Drive cumulative traffic volume between Hill Valley Dr and Kauana Loa Dr 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 for 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-Valiano/non-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: 7983 - 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 or Valiano: 3053 - 1125 = 1928. Also, the Valiano TIA list of cumulative projects includes an erroneous reference to a 216 du Harmony Grove Meadows project which should also be deducted in the amount of 540 ADT, at 10ADT per du and 25% distribution rate consistent with the HGVS trip distribution scheme: 1928 - 540 = 1388. The only other difference in non-HGVS/non-Valiano cumulative projects between the two TIAs is Citracado High School/Del Lago 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 roadway segment, and 1388, the reconciled and corrected ADT for other non-Valiano/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 5980 Existing + 1125 HGVS project + 4099 cumulative projects = 11204, a figure which exceeds the 9700 ADT capacity of the roadway segment by	<p>The commenter is correct that the Valiano project forecasted 2,711 ADT on the segment of Country Club Drive from Hill Valley Drive to Kauana Loa Drive based on its final unit count of 388 DU with its proposed access point at Eden Valley Lane. At the time of the finalization of the HGV South cumulative scenario, the Valiano project proposed access was located at Hill Valley Drive, not Eden Valley Lane. This change of access to the Vaiano project affected traffic at only one unique location within the study area – the segment of Country Club Drive between Hill Valley Drive and Kauana Loa Drive since Eden Valley Lane intersects this segment. The shift in access to the south from Hill Valley Drive to Eden Valley Lane simply continues Valiano traffic to the segment south of Hill Valley Drive. No other study area locations are affected by this change. With the previous access at Hill Valley Drive, the noted segment of Country Club Drive from Hill Valley Drive to Kauana Loa Drive was forecasted to carry 2,067 Valiano trips. The final cumulative amount of 2,280 trips for HGV South included the 2,067 ADT from Valiano assuming the Hill Valley Drive access. With the southern shift in access to Eden Valley Lane along this segment, an additional 644 ADT (2,711 ADT – 2,067 ADT) would be expected to traverse this segment. With the addition of the 644 ADT to this segment of Country Club, the existing + cumulative projects condition changes from 8,260 ADT (LOS D) as shown in the HGV South EIR and TIA to 8,904 ADT (LOS E). The further addition of 1,125 Project ADT to the existing + cumulative projects + project condition results in a change from 9,385 ADT (LOS E) to 10,029 ADT (LOS F). Although a change in LOS occurs with the change in Valiano’s access, the impact identified in the HGV South TIA and EIR remains a cumulative impact, as shown on Table 2.2-6 of the EIR. Because the cumulative impact is already identified as significant, with the additional 644 ADT, there would be no changes to conclusions of significance when evaluated as suggested by the comment. The proposed mitigation would continue to effectively mitigate the impact, as described in the response addressing Traffic item 13, below.</p> <p>The cumulative-only volumes between Valiano and HGV South would not be expected to be exactly the same amount for several reasons. First, the existing counts for Valiano were conducted in 2012. The existing counts for HGV South were conducted in 2014. Both existing scenarios had 100 percent of HGV added in to arrive at the existing baseline volumes. The Valiano existing baseline therefore represented the traffic condition two years prior to the HGV South counts (the Valiano project NOP was issued in 2013). Although the majority of the same cumulative development projects are listed in both reports, several of those projects are large in scale and would be built out in phases over time. As such, many of these projects or phases, had been constructed by the time of the 2014 HGV South counts, two years after the Valiano counts (e.g., San Elijo Hills, San Marcos Creek District Specific Plan, Kaiser Hospital Medical Office, The Quad at CSUSM). This is clearly represented by the fact that the growth in the existing volumes from 2012 to 2014 shows a 40 percent increase in volumes (Year 2012 = 2,610 ADT; Year 2014 = 3,660 ADT). As such, many of the trips generated by these phased cumulative projects (or portions thereof) that have been built were captured in the 2014 HGV South counts as part of the existing HGV South existing conditions baseline. Other reasons for variation in observed volumes as compared to future modeled volumes include the withdrawal of cumulative projects subsequent to identification and evaluation in the EIR TIA, as well as variations in actual observed trip generation as compared to theoretically calculated trip generation (e.g., the assumed 10 trips per dwelling turned out to be too high a projection). Given that these types</p>



Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
					15.5%, yielding a service level rating of LOS F. Furthermore, the substantial excedence of the LOS E threshold relative to the deminimus minority of left turning vehicles northbound Country Club Dr to Eden Valley Lane per Valiano TIA Figure 8-2 calls into question and renders unreasonable the mitigatory value of the left turn lane. For these reasons, the finding of significant mitigatable for the cumulative impact of the project to traffic on Country Club Drive between Kauana Loa Dr and Hill Valley Drive, TR-3, and the prescribed mitigation, M-TR-3, are unsupport 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 and analysis, the impact findings and effectiveness of the mitigation should be readdressed based on accurate data given the critcal 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 pervade the HGVS TIA and DEIR, the entire HGVS TIA and DEIR impact analysis and findings should be reviewed and corrected as necessary to reflect accurate cumulative project traffic volume data.	of changes occur over time with numerous cumulative development projects, it acknowledged that cumulative projections constitute a projection, and variations (especially given passage of time) are expected and normal. It is therefore concluded that the cumulative scenario accurately represents a reasonable projection of the existing plus cumulative conditions at the time of preparation of the Project TIA.  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 confluence of rail and automotive traffic, which is reasonably likely to exacerbate to an unmitgatable significant impact, needs to be evaluated and included in the environmental impact assessment.	LLG considered how the SPRINTER service affects the intersection due to the current headways, cycle lengths, and intersection operations. The SPRINTER headways through the Auto Park Way/ Nordahl Road/Mission Road intersection are currently 30 minutes on weekdays between 4:06 AM and 9:21 PM. The current headways mean the SPRINTER services affect the intersection operations every 15 minutes or four times every hour (two trains eastbound and two trains westbound per hour). There are 36 signal cycles during a typical hour at the Nordahl Road/Auto Park Way/Mission Road intersection based on the average actuated peak hour cycle length of 100 seconds. Therefore, the SPRINTER only affects the signal operations in 4 of the 36 cycles during a typical hour (four times per hour). This SPRINTER effect frequency represents only 11 percent of the signal cycle during peak hour operations. As such, additional analysis is not warranted.
T-5	Mt 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 (2011c). 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	2.2-1	Country Club Dr/Eden Valley Lane and Country Club Dr/MtWhitney 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 (2011c). 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	2.2-1	Corporate Drive which provides a conduit from Country Club Dr between Progress Pl and Meyers Ave or Oppor St to Barham 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 roadways 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 HGV SANDAG model, zero trips are expected to use Corporate Drive. Should some amount of undiscernible traffic use this alternative route, it would divert trips to/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 world 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 Analysis of Project Effects and Determination of Significance, 2.2.2.2 Project Trip Distribution and Assignment	2.2-8	The SANDAG SZA 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 roadways using information available in 2003, over fourteen years ago, and, as such, is outdated precluding the reasonable evaluation of HGVS project and cumulative impacts based on current existing and forecast conditions. One example of a trip distribution factor change since the HGV 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, which 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 been factored into the	The SANDAG SZA 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 judgement. The HGV Series 10 trip distribution assumptions were previously reviewed and deemed reasonable and it is logical that the HGV South Project 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 run 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

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
	distribution since publication of the HGV FEIR				HGV TIA is the recent impact of GPS automatic navigation and routing apps such as WAZE. These applications have altered driving habits and enabled users to access routes they were unaware of or unable to navigate in the past and are now able to use to bypass congested freeways and roads such as the 78/15 interchange area and nearby access roads and alternate routes. The HGV trip distribution is invalid as a model for the HGVS project because it is outdated and does not capture important real world changes to trip distribution since publication of the HGV FEIR such as new roads and the influence of Nav Apps as a trip distribution factor. Because of changes like this subsequent to certification of the HGV FEIR, the HGVS TIA should be re-analyzed based on current conditions and the most recent SANDAG forecast models, and incorporate traffic distribution data available through partnership with WAZE <a href="https://www.waze.com/ccp">https://www.waze.com/ccp</a> to enable impact assessment based on the best accessible current data.	<p>this case. The SANDAG model series are updated every three-to-five years for the purposes of updating the SANDAG Regional Plan. The purpose of that document is to plan for funding different roadway improvements planned throughout the region and does not customarily include new development projects. The model is then made available to local agencies who have the discretion to utilize whichever model they deem most appropriate for their jurisdiction. The custom Series 10 General Plan Mobility Element model was the model recommended for use by the County based on the characteristics of the Project and upon the location of other land uses (particularly HGV), to which Project trips would originate or terminate, such as employment, housing, recreation, and shopping. Next, the HGV project utilized the Series 10 General Plan traffic model to create a customized SZA for that project's distribution. The HGV project land uses were coded correctly into the model and a project-specific distribution was developed assuming the adopted General Plan land use designations in the rest of the region, and the Mobility Element network, including those in the immediate vicinity of the Harmony Grove valley. This generated a distribution that was specialized to the HGV project. The HGV project is immediately adjacent to the HGV South Project. The land uses are consistent, and the road network that the vehicle trips will use is the same. They are both located within the southwest corner of Harmony Grove valley and will have the same local and regional origins and destinations. For these reasons listed above, the most accurate way to determine the trip distribution for the proposed HGV South project was to use the HGV custom County General Plan traffic model. In addition, it is stated in the County guidelines that, "For large projects, trips are distributed onto the road network based upon SANDAG's regional forecasting model, by using a select zone assignment." The Project coordinated with County staff to determine the appropriate SANDAG model for use in the trip distribution, and the County General Plan traffic model prepared for HGV was identified for use in the analysis. In any event, as previously mentioned, this model was correctly coded to represent the planned land uses and network conditions in the County at the time of the General Plan adoption.</p> <p>The comment identifies only two factors or changes that would be accounted for if a Series 12 or 13 models were used instead of a Series 10-based model. However as described further below, neither of these factors have any relevance with respect to this Project. Nor does the comment specifically identify/recommend any changes to the Project's assumed trip distribution percentages that would potentially alter any of the traffic impact findings regarding significance. With respect to the Twin Oaks Valley Road connection to San Elijo Road, this roadway is over 11 miles from the project site and would not be expected to have any substantial effect on Project-related travel patterns.</p> <p>While it is noted that GPS applications, such as WAZE, are available to determine a travel route from one location to another, these types of systems can provide a driver with several options depending on factors such as accident data, roadway construction, and other temporary occurrences that may not represent typical day conditions. For these reasons, local agencies direct traffic engineers to use the SANDAG model as it represents the typical route a driver will choose based on proximity to land uses, existing and planned network conditions, mode splits (carpool, transit, etc.) and incorporates anticipated congestion of roadways. As such, temperamental data from GPS applications can change frequently and would not be the most appropriate basis for determining a project's typical day trip distribution.</p>
T-8	TR-3: Country Club Drive from Hill Valley Drive to Kauana Loa Dr (LOS E) should be LOS F	County: 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	2.2-19	This is false. The segment of Country Club Drive from Hill Valley Dr to Kauana Loa Dr would operate at unacceptable LOS F because the correct existing + project + cumulative project ADT is 11,204 not 9,385 as reported in the HGVS TIA, substantially exceeding the LOS E 9,700 ADT threshold as described in Comment 3.	Please refer to the response addressing Traffic item 3 regarding cumulative traffic volumes provided in the existing + project + cumulative projects condition and the significant and mitigable impact to this segment of Country Club Drive.
T-9	The analysis of existing + project + cumulative project impact to signalized intersections is invalid because the cumulative project impact has been substantially	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)	DEIR Subchapter 2.2 Transportation/Traffic, 2.2.3 Cumulative Impact Analysis, 2.2.3.1 Existing Plus Cumulative Plus Project Impacts, Signalized Intersections	2.2-20	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 they would be if the analysis had been based on correct data. The analysis of existing + project + cumulative project impact to signalized intersections should be redone based on corrected data. Also, the trip distribution method used in the analysis is outdated, does not account for current trip distribution factors with material effects on existing distribution, and, therefore, inaccurately represents project and cumulative project impact to signalized intersections. The analysis of existing + project + cumulative project impact to signalized intersections should be	Please refer to the response addressing Traffic item 3 with regard to the accuracy of the cumulative traffic volumes provided in the existing + project + cumulative projects condition; and to the response addressing Traffic item 7 with regard to the SANDAG SZA trip distribution.

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
	underestimated in the HGVS TIA				redone based on an accurate model of trip distribution using the most recent SANDAG trip distribution model in conjunction with trip distribution statistics available from WAZE and other widely used GPS navigation and routing apps.	
T-10	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	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)	DEIR Subchapter 2.2 Transportation/Traffic, 2.2.3 Cumulative Impact Analysis, 2.2.3.1 Existing Plus Cumulative Plus Project Impacts, Signalized Intersections	2.2-20	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.	Please refer to the response addressing Traffic item 1 with regard to the County's 25 peak hour trip threshold.
T-11	The analysis of existing + project + cumulative project impact to unsignalized intersections is invalid because the cumulative project impact has been substantially underestimated in the HGVS TIA	the Project would cause a significant cumulative impact to the following unsignalized intersection (Impact TR-10):	DEIR Subchapter 2.2 Transportation/Traffic, 2.2.3 Cumulative Impact Analysis, 2.2.3.1 Existing Plus Cumulative Plus Project Impacts, Unsignalized Intersections	2.2-20	The analysis of existing + project + cumulative project impact to unsignalized intersections is invalid because the cumulative project impact has been substantially underestimated in the HGVS TIA resulting in findings of significance less than what they would be if the analysis had been based on correct data. The analysis of existing + project + cumulative project impact to unsignalized intersections should be redone based on corrected data. Also, the trip distribution method used in the analysis is outdated, does not account for current trip distribution factors with material effects on existing distribution, and, therefore, inaccurately represents project and cumulative project impact to unsignalized intersections. The analysis of existing + project + cumulative project impact to unsignalized intersections should be redone based on an accurate model of trip distribution using the most recent SANDAG trip distribution model in conjunction with trip distribution statistics available from WAZE and other widely used GPS navigation and routing apps.	Please refer to the response addressing Traffic item 3 with regard to the accuracy of the cumulative traffic volumes provided in the existing + project + cumulative projects condition; and to the response addressing Traffic item 7 with regard to the SANDAG SZA trip distribution.
T-12	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	the Project would cause a significant cumulative impact to the following unsignalized intersection (Impact TR-10):	DEIR Subchapter 2.2 Transportation/Traffic, 2.2.3 Cumulative Impact Analysis, 2.2.3.1 Existing Plus Cumulative Plus Project Impacts, Unsignalized Intersections	2.2-20	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 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.	Please refer to the response addressing Traffic item 1 with regard to the County's 25 peak hour trip threshold.
T-13	Mitigation effectiveness of M-TR-3 not supported by substantial evidence and unreasonable	M-TR-3 Prior to occupancy of 176 Project units, the Project shall widen Country Club Drive at the Country Club Drive/Eden Valley Lane intersection to provide a dedicated northbound left-turn lane onto Eden Valley Lane. (pg. 2.2-24)  Relative to TR-3, the provision of the left-turn lane at the Country Club Drive/Eden Valley Lane intersection would provide a refuge lane for left-turning vehicles. This would improve the flow of northbound through traffic on Country Club Drive between Hill Valley Drive and Kauana Loa Drive, and reduce the potential for vehicular conflict due to the slowing of northbound traffic. Implementation of this mitigation measure would be expected to reduce this cumulative impact to less than significant. (pg 2.2-26-27)	DEIR Subchapter 2.2 Transportation/Traffic, 2.2.6 Mitigation, Roadway Segments, County	2.2-24, 26, 27	The claim that provision of a northbound left turn lane onto Eden Valley Lane from Country Club Drive would effectively mitigate impact TR-3 to less than significant is invalid because the intersection of Country Club Drive/Eden Valley Lane was omitted from the HGVS TIA, and, with no supporting evidence exhibiting the existing and forecast project + cumulative volume of northbound left turning traffic at the interesection, the assertion is unsupported by any evidence. The claim is further invalid because it is unreasonable. The claim that the left turn lane would reduce the impact to less than significant is unreasonable when evaluated considering the traffic flow projected for that intersection in the Valiano DEIR TIA. According to the Valiano TIA, Appendix H to the Valiano DEIR, Figure 8-2, only 9 of 443 existing + project + cumulative project	The comment assumes that because the northbound turning volumes comprise a relatively small percentage of the overall traffic at the Eden Valley Lane/Country Club Drive intersection, that the effect of those left-turning trips would be minimal on the northbound through flow. This assumption is incorrect. Any disruption of flow, especially during peak morning and evening traffic periods due to through traffic, can cause queuing and excessive delay to the free-flow movement of traffic along a thoroughfare route. The recommendation to construct a northbound left-turn lane would sufficiently mitigate operations along Country Club Drive because it would remove left-turning vehicles from the through traffic lane and move them into the turn lane.  The County allows for the implementation of “spot improvements” to be used where deficient segment operations occur, particularly on roadways where there are no planned widening improvements, as is the case with Country Club Drive. While not formally incorporated in the published County of San Diego Guidelines for Determining Significance

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
					<p>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 the consideration of which has been omitted from the HGVS DEIR. The finding of significant mitigatable per M-TR-3 is unsupported, unreasonable and should be reevaluated pursuant to comprehensive analysis of the Country Club Drive/ 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.</p>	<p>(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).</p> <p>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 HGV South.</p> <p>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 HGV 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).</p> <p>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 HGV 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.</p> <p>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 to/from these intersections.</p>



Response to Comments O6-36 – Recreation

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
R-1	Mileage of nearby trails.	<a href="#">These large open space reserves contain a total of approximately 1,558 acres (including the Olivenheain dam and reservoir) with an associated 9 miles of trails.</a>	DEIR Chapter 3.1.10 Recreation	3.1.10-1	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.	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.
R-2	HGV Equestrian Ranch	<a href="#">. . . 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.</a>	DEIR Chapter 3.1.10 Recreation	3.1.10-1	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.	Comment noted. The comment does not raise any specific issues related to the adequacy of the EIR. Therefore, no further response is required.
R-3	Summit Trail	<a href="#">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 . . .</a>	DEIR Chapter 3.1.10 Recreation	3.1.10-3	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.	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.”

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
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 palletete 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 pallet 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 ( <a href="http://www.sandiegocounty.gov/pds/docs/DPLU199.pdf">http://www.sandiegocounty.gov/pds/docs/DPLU199.pdf</a> ). 2) Not native to San Diego County and is able to naturalize in our environment thereby spreading and invading into protected natural spaces ( <a href="http://www.cal-ipc.org/ip/management/ipcw/pages/detailreport.cfm@usernumber=72&amp;surveynumber=182.php">http://www.cal-ipc.org/ip/management/ipcw/pages/detailreport.cfm@usernumber=72&amp;surveynumber=182.php</a> and <a href="http://homeguides.sfgate.com/problems-pepper-tree-plants-69894.html">http://homeguides.sfgate.com/problems-pepper-tree-plants-69894.html</a> ).	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.

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
R-9	Cumulative affects on existing parks	. . . the cumulative projects 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	3.1.10-7	Provide evidence of this statement. The local adjacent parks, Del Dios Highlands Preserve, the Elfin 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 is decreased flora and fauna which would take years to repair if it ever could be repaired.	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.
R-10	Significant Impacts	Based on the analysis provided above, the Proposed Project would have less than significant impacts related to parks and recreation.	DEIR Chapter 3.1.10 Recreation	3.1.10-7	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.	Please refer to the response addressing Recreation item 8.

Response to Comments – Alternatives

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
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 San Diego County by expanding an existing village that will further enhance and support the success of that village . . .	DEIR Chapter 4.0	4-3	This Project is not an expansion of the existing village in HGV as it is proposed. The village concept in HGV has the highest density in the center retail/commercial area with lesser density as residences move away from the center. HGVS property is outside of the village center across Harmony Grove Road and 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.	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.
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.		4-3	The two transit centers are at Nordahl Road and the Escondido Transit Center. These are not within easy walking distance (2.9 mi to Nordahl 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. <a href="http://www.its.berkeley.edu/sites/default/files/publications/UCB/2011/VWP/UCB-ITS-VWP-2011-5.pdf">http://www.its.berkeley.edu/sites/default/files/publications/UCB/2011/VWP/UCB-ITS-VWP-2011-5.pdf</a> ).	The cited 0.5 mile is a development standard used for addressing transit-oriented development (TOD) projects. The HGV 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 Nordahl 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.
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.		4-3	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.	Please see the Global Response to Project Consistency with General Plan Policy LU-1.4 which includes analysis of land use compatibility with the surrounding area, including the adjacent Harmony Grove Village (HGV). 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 onto 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 not inconsistent with the EIR.
A-4	Plan incompatible with project objectives	Encourage adaptive grading, whenever 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.		4-4	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.	The waiver is requested in accordance with the Resource Protection Ordinance (RPO) because rationale 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 Figure 2.1-10, Topographic Cross Sections.
A-5	Completion of Harmony Grove Village	Alternative Location - " . . the property was purchased with the intention of completing the existing HGV village."		4-5	This statement needs further explanation. HGV was approved by the County as a complete entity. It is not owned by the developers of HGVS and was not proposed with HGVS as a part of it. Unless the County is withholding relevant facts from the community, this statement does not make sense.	The statement is intended to disclose the intent of the current owner of the HGV South property. He did purchase the property with the intent to extend and complete the village.
A-6	Reason this was rejected	Steep Slope Avoidance Alternative - The potential to design alternatives with development located further from preserve areas located south of the site and minimizing potential edge effects through clustering of development out of the southern third of the site (while still providing the housing counts necessary to support on-site sewage treatment) led to rejection of the Steep Sloape Avoidance Alternative.		4-5	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 adjacent to other preserved lands (the Escondido Creek) so it should be 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 Elfin-Forest/Harmony Grove Community Plan within the County General Plan.	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 issues. The focus on alternative discussion relative to preserve areas southerly of the Project parcels 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 extension 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 environmentally preferred alternative in Chapter 4.0 is one of the lesser density alternatives (which proposes up to 119 homes) and was identified as consistent with the General Plan.
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		4-8	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 developments in all portions 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 was	CEQA does not require evidence that project amenities are needed. CEQA Guidelines Section 15124 addresses project description, and Section 15124(b) specifically addresses objectives. That 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 will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary.

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
		of a destination gathering place for the Project and surrounding areas (Objectives 2, 4, and 7, respectively).			desired by people driving out to Harmony Grove, then the new homes in Harmony Grove Village would have had greater demand and the homes would sell faster.	
A-8	Housing and biological conservation	. . provision of housing and support of facilities and services provided by HGV, provision of mixed residential uses to support diversity of resident and lang uses, or creation of a mixed-use development (Objectives 1, 5, and 6, respectively). Permanent set aside of important and managed biological resources that would contribute to the block of preserved habitat located in the DDHP and EFRR, also would not occur, contrary to Objective 3.		4-8	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's 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, Ry. 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 HGVS 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.	The comment is not understood. If the request is for the No Project Alternative to be considered by the County, it 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.
A-9	Water quality improvement	. . . improvements to creek water quality resulting from removal of the at-grade crossing and underlying culverts and re-creation of a free-flowing creekbed, also would not be expected to occur.		4-8	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.	The improvements are readily understandable -- removing an at-grade crossing that floods or has runoff 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.
A-10	Possible Escondido Creek sewage contamination	General Plan Consistent with Septic Alternative - Another creek-related issue would be potential failure of the planned alternative septic system. Review of the County's Harmony Grove Village South Project Chapter 4.0 Draft Environmental Impact Report Project Alternatives 4-12 Environmental Health website ( <a href="http://www.sandiegocounty.gov/content/sdc/deh/lwqd/lu_septic_systems.html">http://www.sandiegocounty.gov/content/sdc/deh/lwqd/lu_septic_systems.html</a> ) indicates that issues with leach fields and failure of other septic system elements are known to result in groundwater contamination. If such failure occurred under this alternative, downstream pollution also could occur in Escondido Creek.		4-13	Provide evidence that the specific septic system being proposed would bemore likely to cause contamination to the creek than the in-site sewage treatment. HGV has already caused sewage contamination to spill into the Escondido Creek (Notice of Violation No. R9-2017-0062, CalAtlantic Homes, Harmony Grove Village Development, Escondido, San Diego County). According to the DEIR, "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." This appears to be a permanent plan. This would seem to be an area of potential spillage, not to mention the potential for lingering odors between trucking 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?	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.
A-11	Expanding an existing village	. . . it would not achieve the underlying purpose of the Project of accommodating a portion of the projected population growth and housing needs in San Diego County by expanding an existing village that will further enhance and support the success of that village.		4-13	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. HGVS 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.	An expansion of an existing or planned village in accordance with General Plan Policy LU.1.4, 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.
A-12	Effects on jurisdictional water	General Plan Consistent with Sewer Alternative - . . . although the Proposed Project wuld not directly impact on-site (non-RPO) jurisdictional waters, some brush management impacts south of the Project build footprint are anticipated to occur.		4-18	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.	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.
A-13	Operational effectiveness of HGV	Also as a result of having substantially fewer units when compared to the Project, this alternative is less effective in optimizing the operational effectiveness of public facilities and services of the existing village.		4-20	Explain why HGV needs more development in order to optimize operational effectiveness of facilities and services. Based on the plan developed for HGV and approved by the SDCBOS, HGV should be able to support itself. If it is unable to, this new information should be detailed for the reader to understand this statement.	The General Plan supports creation of vibrant and economically sufficient communities, enhancing the vitality and livability of existing villages (General Plan page 3-31). The comparison simply notes that the option with more residents better supports these goals and is consistent with the goals and intent of the General Plan, which makes it more preferred for this issue.

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
A-14	Public/Commercial facilities	Senior Care Traffic Reduction Alternative - No commercial uses or community gathering locale 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.		4-21	This statement would seem to make a senior community inconsistent with the area as seniors would need closer amenities such as shopping, public transportation, public services (post office, community centers, etc) due to greater difficulty with mobility. How would this alternative mitigate this need.	Consistent for all residents of this portion of Harmony Grove, some commercial opportunities are expected to be available at HGV, and other commercial opportunities (as well as the full range of other public amenities) are close by in the City of Escondido. Please also see the Global Response to Project Consistency with General Plan Policy LU-1.4 and DEIR Response to Comment I37-15.
A-15	California gnatcatcher	Biologically Superior Alternative - . . . this alternative would preserve 3.5 acres of the Intermediate Value sage scrub habitat in this eastern area, and would avoid impacts to a portion of the habitat supporting the gnatcatcher nest location and surrounding foraging and dispersal habitat.		4-31	This is not an insignificant point made in the document. Why couldn't this 3.5 acres of Intermediate Value sage scrub be preserved in the Project. How could the project be changed to preserve it?	The Project is the Project as proposed. The alternative was designed in concert with resource agency staff to address this specific issue. This element will be considered by the decision makers, but does not need to be included in the Proposed Project.
A-16	Biosolids	Off-Site and Combined On-/Off-Site Sewer Option Alternative - Due to the small size of HGV 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.		4-35	Provide evidence supporting the estimated number of truck loads. How will the development deal with the odor of solid storage and the risk of spillage in transporting this waste? Currently the HGV development is trucking all of their waste to another facility three times a day and there has already been a sewage spill (Notice of Violation No. R9-2017-0062, CalAtlantic Homes, Harmony Grove Village Development, Escondido, San Diego County) and a lingering odor at the pump station.	<p>The numbers of trucks would be consistent with the largest potential project, the Proposed Project. As stated on page 1-15 of the DEIR: "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. Once biosolids are dewatered, they would be trucked to a landfill for final disposal, estimated to require one truck per month."</p> <p>The potential impacts associated with wastewater, including accidental contamination, are included in EIR Section 3.1.4, Hazards and Hazardous Materials, and technical appendix K.2, Hazardous Materials Records Review Update. Nuisance odor effects are addressed in Subchapter 2.6, Air Quality. The same requirements would apply to an alternative which proposed similar wastewater facilities and infrastructure.</p>
A-17	Using HGVWRF	Connection to the HGV WRF - The existing HGV WRF could be used to serve the Proposed Project if actual use rates at the HGV WRF demonstrate that it could accommodate the flows from both the Proposed Project and HGV as it is currently built.		4-35	The development plan adopted by the County for HGV specifically stated that their water treatment facility would only be used for HGV and not be a step towards future development in Harmony Grove. Provide documentation on how the County would make this GPA.	The treatment plant was designed by HGV to be of a size to serve that project. There have, however, been improvements in treatment technique and efficiencies since that project was approved. In order for the Off-Site and Combined On/Off Site Sewer Option Alternative to be feasible, the HGV WRF and the County would have to demonstrate capacity for that facility.
A-18	Sewer Pipe	An 8-inch gravity-flow would be extended from the Project within Country Club Drive to Harmony Grove Road. The lines would cross Escondido Creek via installation into a bridge structure to be built commensurate with the Project		4-36	Provide documentation on emergency plan for a pipe break and possible contamination into the Escondido Creek. This could be a very costly accident. The Hale Avenue Resource Recovery 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 wastewater upgrade too slow." The San Diego Union-Tribune. 28 May, 2009. Web. 2 May 2017. <a href="http://www.sandiegouniontribune.com/sdut-lmc28waste031235-citys-wastewater-upgrade-too-slow-2009may28-htmlstory.html">http://www.sandiegouniontribune.com/sdut-lmc28waste031235-citys-wastewater-upgrade-too-slow-2009may28-htmlstory.html</a> .	The potential impacts associated with wastewater, including accidental contamination, is included in EIR Section 3.1.3, and technical Appendix K.2. The same requirements would apply to an alternative which proposed similar wastewater facilities and infrastructure.
A-19	Wet weather storage	Alternatively, other scenarios could be explored in the future, as appropriate, such as expanding the existing wet weather storage on HGV, or it could be on another site.		4-36	How can HGVS commit the HGV development to provide wet weather storage for their development? What other sites are referred to in this statement? Only one possibility is listed, Rincon MWD. What other sites are being considered? How would HGVS access these outside sites? Would they have to run more pipe?	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.
A-20	Wet weather storage	It is likely that reassessment of the reservoir would allow for additional storage as only a portion of the available volume available in the reconditioned quarry will be utilized by that project.		4-36	Who would pay for this reassessment? The developer? The HOA? The County?	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. As noted, if "other alternatives are explored in the future" they would be subject to CEQA review as well. The source for the information was EIR technical Appendix Q, Sewer Master Plan. See Chapter 4 of that document.
A-21	Pumping sewage across Escondido Creek	Combined On-/Off-site Wastewater Treatment - A pump station would be included within the on-site facilities, and off-site utilities would include the gravity feed lines to the existing pump station on Harmony Grove Road, as well as a sewage solids line and potential fiber optics line extending from the Project north along Country Club Drive into the HGV WRF.		4-37	Provide emergency plan for containing contamination for possible pipe breakage and sewage spill into or near Escondido Creek.	The potential impacts associated with wastewater, including accidental contamination, is included in EIR Section 3.1.3, and technical Appendix K.2. The same requirements would apply to an alternative which proposed similar wastewater facilities and infrastructure.

Comment O6-36

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
A-22	Operational Studies	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.		4-37	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?	<p>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:</p> <p>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.</p> <p>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.</p>
A-23	Sewer Alternative impacts	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.		4-42	Provide evidence for the statement that variations in impacts would be minor and would not need mitigation. Specify what the impacts could be.	<p>Please see the response addressing Alternatives item 22.</p>



Response to Comments – Infrastructure

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
I-1	Funding for the Country Club Bridge		Specific Plan	?	Who is going to pay for it? The Specific Plan talks about it being funding at a later date.	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.
I-2	Disclosure of school fees agreement	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.	Public Services section	3.1.9-4	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?	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.

Response to Comments – GHG

#	ISSUE	DEIR QUOTE(S)	DOC	PAGE	COMMENT	RESPONSE TO COMMENT
GHG-1	Inconsistent population estimates	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 acre, for a total service population of 1,193 persons (SANDAG 2016).	DEIR Subchapter 3.1.3 Greenhouse Gas Emissions	3.1.3-20	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.	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 this and other projections (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.