### Response to Comment RI6-1

The County acknowledges these introductory comments. Regarding your letter of June 19, 2017, please refer to DEIR Responses to Comment Letter I37. No additional response is required.

### Response to Comment RI6-2

The comment generally states that the Project will have a significant effect on increasing greenhouse gases (GHGs) due to the length of vehicle trips for employment. Please see the Global Responses to Regional Plan Conformity in this FEIR regarding the Project location and adjacent services, jobs, and shopping opportunities. Relative to travel on I-15 and SR-78, please see Subchapter 2.2, *Transportation/Travel*, in the EIR. Project trips make up a very small percentage of peak hour trips on those facilities. Information as to each of these issues is additionally briefly summarized below.

Regarding the location of the Project and the distance drivers would have to travel to access their jobs, please see the Global Responses to Regional Plan Conformity. The Project parcels are sited in the western part of the County, on and near roads accessing the cities of Escondido and San Marcos (via Country Club Drive (both cities) as well as via Harmony Grove Road to the City of Escondido). These routes also take area residents directly to SR 78 and toward I-15, which link to other area cities. As described in Subchapter 2.2, *Transportation/Traffic*, and the Project Transportation Impact Analysis (TIA) (Appendix D to the EIR), no Project-related significant impacts to I-15 or SR 78 would occur. The Project TIA looked at existing roadway configurations as well as configurations following the Project and other future improvements. The Project vehicle miles traveled (VMT) modeling (based on the San Diego Association of Governments’ model) accounted for this; which resulted in the Project VMT falling just under the regional average. The Project is also located within 3 miles of a Sprinter and bus hub at the Nordahl transit station, which is very unusual for residences in County unincorporated lands. As described in the EIR and cited below in Response to Comment RI6-5, the location of the Project is near shopping and services as well as employment.
The mobile source emissions were calculated using an industry standard model: the California Emissions Estimator Model (CalEEMod).

The Project was analyzed to generate approximately 4,500 average daily trips (ADT), with an average trip length of 7.88 miles/trip. This is actually a conservative (greater impact) analysis. This is because traffic study was initially prepared prior to identification of the Project-proposed number of homes and types (single-family and multi-family) unit counts. The Project is proposing 193 single-family units projected to generate 10 trips (each equating to 1,930 ADT), and 260 multi-family units projected to generate 8 trips each (equating to 2,080 ADT). Thus, the actual total ADT would be 4,010, and not approximately 4,500. Documentation of this is provided in the Project Final TIA, EIR Appendix D in a memorandum titled “HGVS -- Trip Generation Comparison.” This is a reduction in traffic volume of 490 ADT, or roughly 10.9 percent from the analyzed Project. The associated mobile source GHG emissions, therefore, also are overstated by approximately 458 MT CO₂-e from what was originally modeled under the 4,500 ADT scenario and from the conservative numbers provided in the 2018 recirculated RDEIR. Regardless, CalEEMod relies upon emission factors for each vehicle model year and type based on individual counties, air basins, air districts, and statewide averages for all fuel types. The emissions associated with on-road mobile sources includes running, idling, starting, and evaporative loss emissions.

The County finds that the Project documents accurately reflect the industry standard modeling and mitigation is proposed consistent with state law. Project GHG emissions would be addressed through the mitigation identified in Subchapter 2.7, Greenhouse Gas Emissions, which proposes mitigation through carbon offsets of the full Project rather than simply the “additional” residences/uses proposed under the GPA, and also would further reduce GHG contributions through the benefits identified as part of the landscaping plan, discussed in Response to Comment RI6-6, below. The Project would therefore actually result in a projected net decrease of GHG emissions in the County over continuation of on-site existing conditions.
Response to Comment RI6-3
The comment generally states that the developer should provide public transportation and that it is inadequately addressed in the RDEIR. The County disagrees. The North County Transit District is responsible for provision of bus service within their service limits. They have indicated that they find the Project consistent with their standards and that no impacts to bus stops would occur at this time (see DEIR letter L3). The comment does not specifically state what the REIR should have analyzed with regard to public transportation; therefore, no further information can be provided. In addition, an area within the developable portion of the Center House will be reserved for dedication for a transit stop for bus service when a local transit line is extended to service the Harmony Grove Village/Harmony Grove Village South area, rendering it “transit ready.” The Project’s proposed circulation network of sidewalks, trails, and bicycle routes, will connect to the transit stop to further provide a regional alternative transportation system.

Response to Comment RI6-4
The comment generally states that the developer should provide a “safe bike route” from the development to Escondido or to the coast. CEQA requires a nexus. The County agrees that not all residents would or could (or would want to) ride bikes to work. The purpose of the multi-purpose trails associated with the Project is to address multiple uses. Not all GHGs are generated by individuals going to and from work. Some are generated through travel to shop, access recreational areas, visit friends, etc. To the extent that opportunities to do any of these things are located within the Project, or between the Project and Harmony Grove Village, these trails provide nonvehicular transportation options that allow residents (as well as existing adjacent community residents) the ability to comfortably walk or ride rather than reaching for the car keys. The comments regarding current activities of bike riders during congestion and projected issues are noted. The number of individuals anticipated to ride bikes during peak rush hours, however, is unknown and speculative. Both bike riders and drivers are responsible for using existing roadways in a responsible fashion. There is no nexus to require the Project developer to provide a “bike only route to Escondido or to the Coast” and no ability to require private property owners along the route to yield their property to accommodate such a use on behalf of a private project. The planning of bike routes and trails is the responsibility of
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<td>land use planning agencies (the County, area cities). The Project is consistent with the County regional trail system and local planned trails.</td>
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Response to Comment RI6-5

The comment questions the analysis regarding solar panels proposed by the developer that will offset 100 percent of the electricity use. The ability of the Project to attain offset energy needs through on-site solar is documented in the ConSol Report in Appendix J to the EIR. Both single- and multi-family designs of this Project were analyzed by ConSol, including assumed conditions in which panels could not be placed on south-facing directions. The results of the ConSol Report modeling indicate that 100 percent of the average energy use for each building type on-site energy needs can be met with this system through proper design. The modeling conservatively assumed that not all buildings could be placed in optimal orientation and on-site reductions would still be adequate. Solar panels actually do work on cloudy days; although they produce less power than on sunny days, they still do continue to produce power (https://cleantechnica.com/2018/02/08/solar-panels-work-cloudy-days-just-less-effectively/).

In addition, on very sunny days, it is expected that more energy would be put into the grid than would be required so that it balances out over the year. Although the Applicant will provide homeowners with information that may lead to some reductions in energy consumed, there is no way to accurately project the extent to which that might occur. As a result, no deduction was taken based on future resident actions on that point. The energy used in car trips, and the emissions that result from that use, were fully factored in to Project impact analyses. Please see Subchapter 2.7, Greenhouse Gas Emissions, as well as Section 3.1.1, Energy, of the FEIR. Please also see the Global Responses to Carbon Offsets, in this FEIR, for information regarding overall Project reductions to net zero.

Response to Comment RI6-6

Please see the Global Responses to Carbon Offsets, in this chapter of this FEIR, for information regarding the nature and location of offset credits and their efficacy. As discussed in the global response, GHG emissions and climate change are a global, cumulative issue. It should also be noted that several state agencies and regulations (including CEQA) recognize carbon offsets as mitigation. The Project has incorporated all feasible mitigation measures cited in the County Climate Action Plan (CAP) as well as the California Air...
Resources Board's Scoping Plan Update (see Appendix J to this EIR). All feasible mitigation measures have been applied to the Project, even those from the CAP, even though it was approved after the Revised DEIR was submitted for circulation. This includes on-site reductions first, followed by off-site credit purchase. The Project therefore adequately mitigates GHG impacts to less than significant, as adequately detailed in the FEIR.

As described in Subchapter 2.6, *Air Quality*, of the EIR, criteria emissions associated with the Project would be less than significant; there are no significant effects to the local air basin (the San Diego Air Basin) and mitigation is not required. Similarly, there are immediately abutting energy connections. Please note that the Project would offset 100 percent of its energy needs through use of on-site photovoltaic panels, and would be built to the latest code (see EIR Table 1-2, *Project Design Features*, and Subchapter 2.7), requiring additional energy reducing elements/amenities; such as Energy Star appliances, low-water landscaping, low-flow fixtures, use of recycled water, plumbing for EV-charging stations in residential garages, etc. Project energy consumption related to construction (equipment use); operations, including stationary demands (e.g., electricity, natural gas, water, wastewater); mobile energy needs (fuel for vehicular trips); and waste of non-renewable energy are all addressed in FEIR Section 3.1.1, *Energy*. Impacts were quantified (see Tables 3.1.1-8 through 3.1.1-10), and as described in text, both direct and cumulative impacts were found to be less than significant.

Regarding local temperature rise, it is acknowledged that blacktop reflects greater heat than soil or vegetation and that the Project site currently primarily contains non-native grassland and scrub habitats. The Project does not propose large expanses of blacktop, however, and expressly proposes use of concrete and surfaces such as decomposed granite for sidewalks and pathways. Please also see FEIR Subchapters 2.3, *Biological Resources*, and 2.7, *Greenhouse Gas Emissions*, for information on replanting of native vegetation areas associated with biological open space and Escondido Creek, and GHG reductions due to landscaping sequestration, etc., respectively. Specifically regarding the landscaping, the Project would plant a minimum of 2,045 trees. Relative to GHG emissions, the sequestration provided by those trees would roughly double
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<td>the amount provided by the current on-site vegetation. The canopies of those trees also would cast shade and minimize heat sink in their vicinity. Additional shrubbery and ground cover also would contribute to absorption, rather than reflection, of heat.</td>
<td>Solar tracking stations are not necessary for this Project. Modeling for the rooftop solar shows that it can accommodate projected on-site energy needs without such a station (see the ConSol Report in EIR Appendix J. With respect to complying with LEED Platinum standards, the Project would consistent with Title 24 and include the design features provided above in this comment related to use of solar photovoltaic panels, low-water use, high-efficiency appliances, etc. Comments regarding community opposition and fire danger do not raise an issue concerning this Revised DEIR pursuant to CEQA Guidelines Section 15088.5(c). For a full description of the scope of recirculation for this EIR, please see the Recirculation Readers Guide, dated February 22, 2018. Relative to areas not addressed in the Revised DEIR; community opposition is not a CEQA topic per se. Proposed amendments of the existing General Plan and Community Plan, however are addressed in the Global Responses to General Plan/Community Plan CEQA Impacts Analysis. Fire hazards are expressly addressed in Section 3.1.3, Hazards and Hazardous Materials, of the FEIR, in the Project Fire Protection Plan, and in the Global Responses to Fire Hazards Impact Analysis, and Adequacy of Emergency Evacuation and Access in this FEIR.</td>
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**Response to Comment RI6-8**

The attachments to this letter were composed of submittals made on the DEIR as part of Comment Letter I37. Please see the DEIR Responses to Comments I37-1 through I37-61.

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**Address Attachments RI6-8**