As an introductory general response to all of the comments below, it is noted that these comments relate to an issue outside the scope of recirculation pursuant to CEQA Guidelines Section 15088.5(c), which was limited to the environmental issue of greenhouse gas (GHG) emissions. For a full description of the scope of recirculation for this EIR, please see the Recirculation Readers Guide, dated February 22, 2018. While the comments do not address an issue in this Revised DEIR, they do pertain to analysis in the FEIR and raise issues that vary in specifics from those received on the DEIR. As such, responses are provided below.

Specific to information in RI7-1, the comment is introductory to the email and provides general opinions of the commenter with no supporting detail as to specific issues. No additional response is warranted. The reader is referred to responses to specific comments in Response to Comment RI7-4, below.

Response to Comment RI7-2
The comment raises concerns regarding evacuation time, as well as a contention that the Project is inconsistent with several policies in the Land Use and Safety Elements of the General Plan and asks that they be considered. Please refer to Response to Comment RI7-4 of this letter regarding evacuation time. Please see Response to Comment RI7-6 regarding General Plan Elements.

Response to Comment RI7-3
The comment is informational, indicating attachments provided with the comment. No additional response is required.

Response to Comment RI7-4
The comment suggests that an internal inconsistency was identified within the Harmony Grove Village South (HGV South) Fire Protection Plan (FPP). Specifically, the comment states that the evacuation time estimate on page 34 is inconsistent in the FPP and the inconsistency could require an update to the hazard impact assessment. There is no inconsistency in the FPP; however, it is acknowledged that the analysis could have been clearer and therefore is clarified below.
The FPP introduces an average timeline for evacuations that can result in up to 90 minutes from the time the decision to evacuate is made until the last residents of a community leave their driveway in their vehicles. This timeline is not easily applied universally due to the varying sizes of communities. For instance, a large community with many residents will take longer to evacuate than a small community with few residents. Further, a community that includes two lanes for egress will be able to evacuate faster than a community with one lane. The constants in the estimate are the 45 minutes associated with the: (1) decision to evacuate, (2) notification to initiate Reverse 911, (3) police response to area, and (4) completion of Reverse 911. This estimate is meant to provide perspective on how much time it can take to get people into their cars and starting to move from the area. Because there is so much variability in this timeframe and there is not a HGV South–specific timeframe, the 45 minutes associated with gathering belongings is not accurate or applicable. In conclusion, the perceived inconsistency is in fact not an inconsistency.

Also, a well-prepared, practiced community such as HGV South is planned to be, and that follows the “Ready, Set, Go” program, would have a faster response time as residents would be anticipated to have personal action plans in place. Lastly, the total evacuation time provided in the FPP is corroborated in the HGV South Wildland Fire Evacuation Plan (Evacuation Plan) that indicates that the 30-minute timeframe (travel time) to evacuate the community is considered adequate and confirms that the total evacuation time (from first notice) could take 1.25 to 2.25 hours. Regardless of the calculated evacuation time, because the community offers a contingency to evacuation, at any point during an evacuation, the evacuation could be stopped and residents directed to remain in their protected homes or at the community clubhouse as a temporary refuge. Therefore, the DEIR hazard section does not rely on the FPPs calculated evacuation times alone and incorporates the evacuation contingency into its impact analysis. Without the contingency option of temporary refuge, the impact analysis conclusion could be different than less than significant, but with that option, impacts are determined to be less than significant.
### COMMENTS

**Comment Letter RI7**

12, an additional 30 minutes is a reasonable time period to add to the analysis of time to evacuate from ignition. Accounting for the inconsistency and the omission, the correct lane total evacuation time is 2’30” from evacuation protocol initiation and 3’00” from wildfire ignition.

**COMMENT RE: FPP pg 34 TEXT MARKED “B” (attached)**

For the same reasons cited above, the correct lane total evacuation time is 2’00” from evacuation protocol initiation and 2’30” from wildfire ignition.

**COMMENT RE: SIGNIFICANT HAZARD IMPACT AND INCONSISTENCY WITH GENERAL PLAN LAND USE AND SAFETY ELEMENTS**

Evaluating the emergency evacuation impact of the Project based on the corrected analysis above in conjunction with the HG WUFERP, it can be demonstrated that the hazards associated with wildfire are significant and almost certainly unmitigable. Additionally, it can be demonstrated based on the corrected analysis above that the project is consistent with numerous safety and land use elements. A significant hazard impact would occur because the wildfire was not modeled as simulated in the HG WUFERP Offshore Forecast for approaching the Project in approximately 2’30”, the same evacuation time from wildfire ignition demonstrated above under the two-lane scenario. An evacuation time period the same as the forecast arrival time of fire leaves no safety margin. Such a safety margin is prudent and necessary to allow for contingencies such as, but not limited to, a longer interval than anticipated from ignition to evacuation protocol initiation; extra resident prep and departure time; impediments to departure such as vehicle breakdowns or accidents; and fire spread rate of spread faster than forecast. Regarding the potential for faster rate of spread, the 2017 Lilac Fire traveled approximately four miles in 2’45”, from ignition at 11:15 am until 2:00 pm (Lilac Fire AAR, page 12 & D-1). The fire occurred under real conditions similar to those simulated in the HG WUFERP Offshore Forecast, yet the distance of fire travel in the forecast simulation is only one and one-third miles, far less than the real-world Lilac fire traveled in approximately the same time period. In fact, there is a substantial probability that if a fire were to originate as per the HG WUFERP Offshore Forecast at a time and under conditions similar to the Lilac Fire could move at the same rate as the Lilac fire, much faster and farther than simulated in the HG WUFERP Offshore Forecast. Under these circumstances, the fire could travel the one mile from the simulated point of ignition to the Project area in far less than 2’30”, perhaps more on the order of 1’30”. Given that there is a substantial probability that a fire behaving similarly to the Lilac Fire under similar conditions could reach the Project area in approximately one hour less time than would be required to complete evacuation, and because such a fast moving fire would arrive at the project site with sufficient intensity to obviate most suppression efforts (as did the Lilac Fire) and entrap far more residents than could be accommodated by the shelter in place facility envisioned in the Project EIR, per the corrected analysis above, hazards to Project residents associated with wildfire are significant and unmitigable.

Further, it can be demonstrated based on the corrected evacuation time analysis above that the Project would violate several General Plan Land Use and Safety Element policies.

"LU-6.10 Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards."

Violation of GP LU-6.10 would occur because the Project property is located in a designated high fire risk area with a design density that includes more residents than can be safely evacuated in the time available as per the corrected analysis above, thereby failing to locate and design to protect residents from the risk of natural or man-induced wildfire hazards.

"S-5.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards."

Violation of GP S-5.1 would occur because the Project population exposed to the wildfire hazard described in the HG WUFERP Offshore Forecast would exceed safe limits as demonstrated in the corrected analysis above, and

### RESPONSES

**Response to Comment RI7-5**

The County disagrees that the perceived inconsistency changes the impact assessment conclusions, causes inconsistency with General Plan Elements, and that the forecasted fire behavior modeling is not accurate. Please refer to Response to Comment RI7-4 above for description of why the hazard section impact analysis remains accurate. Although discussion of General Plan consistency is indicated in the heading, it is addressed in Response to Comment RI7-6, below. Please refer to Response to Comment RI7-6 for why the Project is consistent with the noted elements of the General Plan.

Regarding the Lilac Fire spread rates, it is not accurate to compare fire spread rates from two very different fire environments. The Lilac Fire spread through a continuous fuel bed along the San Luis Rey River bottom that included willow riparian forest, driven by extreme winds that were aligned with the river bed. The Harmony Grove area does not include continuous, long stretches of wide, unbroken fuel beds; is subject to different wind exposures; and was modeled according to one of the most sophisticated fire behavior models available by Rohde & Associates (2017). The comments regarding faster spread and shorter timeframes for fire arrival would not be expected for the fire scenario referred to in the comment, but scenarios where this could be possible were anticipated in the Project’s FPP and resulted in the development of evacuation contingency options, as discussed in Response to Comment RI7-4.

The County disagrees that the provided information invalidates the EIR less than significant conclusion for cumulative fire hazards impacts. The most significant omission from the comment’s provided analysis is that it fails to include any consideration of the recent area improvements that offer enhanced evacuation options (Harmony Grove Village Parkway), potential sheltering vs evacuation (HGV South, HGV), improved, protected roadways (HGV South, HGV), improved emergency response and presence (New Rancho Santa Fe Fire Protection District Fire Station), and identified evacuation route last resort refuge options (HGV South Evacuation Plan). The most significant of these would be the ability for emergency responders to direct existing residents, who do not live in the highly ignition-resistant new communities, to seek temporary refuge within one of the new communities as an option if specific evacuation
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>routes are considered unsafe, congested, or otherwise not available during a short-notice evacuation or when roadways are not available. The addition of these new evacuation options essentially reduces the distance some existing residents would have to travel to arrive at areas where they could seek temporary refuge, reducing overall travel distances and travel times.</td>
<td></td>
</tr>
</tbody>
</table>
| **Response to Comment RI7-6**
The County disagrees with the comment that General Plan Land Use and Safety Element policies are violated by the HGV South EIR or technical studies. The comment identifies perceived inconsistencies that are primarily based on an inaccurate interpretation of the FPP and evacuation times, as previously detailed in Responses RI7-4 and RI7-4. |
| Specific to General Plan Policies LU-6.10 (Protection from Hazards), S-1.1 (Minimize Exposure to Hazards), S-2.6 (Effective Emergency Evacuation Programs), and S-3.6 (Fire Protection Measures), the County disagrees. The DEIR and FEIR Section 3.1.3, Hazards and Hazardous Materials, the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access in FEIR Chapter 8, and the Project FPP all provide detailed discussion regarding the site-specific topography, vegetation, and existing and planned access, as well as surrounding land uses. These same discussions provide detail as to Project design elements to address each of the noted constraints, e.g., expanded fuel management zones, type, and location of Project landscaping, enhanced building design standards, on-site street width and designated parking to ensure open emergency vehicle access, 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, as noted in Response to Comment RI7-4 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. The Project is consistent with the relevant policies of the of the General Plan Land Use and Safety Elements.

consequently, the density allowance required to facilitate the Project population level would fail to reflect this critical site specific constraint.

"5-2.6 Effective Emergency Evacuation Programs. Develop, implement, and maintain an effective evacuation program for areas of risk in the event of a natural disaster."

The Project site is a proven area of high wildfire risk and the significant evacuation impact of the Project as described in the corrected analysis above would preclude development, implementation and maintenance of an effective evacuation program thereby causing the County to violate 5-2.6 if the GPA is granted. The time to effect Project evacuation, based on the corrected analysis above, would be so substantially greater than the time period of safe egress route access under a reasonable worst-case scenario that development of an effective emergency evacuation program would be infeasible.

"5-3.6 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."

The HGVS development is located within a fire threat area and because of the significant evacuation hazard impact of the Project, as per the corrected analysis above, despite mitigation measures that may reduce risk of structural and human loss due to wildfire within the development, the Project would increase the risk of structural and human loss due to wildfire, particularly due to entrapment risk, for potential HGVS residents and residents of the surrounding affected area in violation of General Plan Policy 5-3.6 because the time to evacuate the area would substantially exceed the time period of safe evacuation route access, under a reasonable worst-case scenario.
The County acknowledges the inclusion of page 34 from the HGV South FPP, provided as reference to Comment RI7-4. The comment is informational and comments referencing this page have been responded to in Response to Comment RI7-4, above. No additional response is required.
Response to Comment RI7-8
The County acknowledges the provided Lilac Fire After Action Report. This information raises no new issues and is not applicable to fire spread within the Harmony Grove area based on different fire environments, as described in Response to Comment RI7-5, above.
Comment Letter RI7

Lilac Fire 2017 sequential maps showing changes to the Fire Perimeter as well as Evacuation Warning and Order areas on Thursday, December 7, 2017, from 2:00pm through 11:00pm.
Response to Comment RI7-9
This comment is introductory to the second email, and does not raise any new issues with regard to the DEIR or its analysis. No response is required.

Response to Comment RI7-10
Comments noted. They provide the opinion of the commenter, and are conclusory in nature, without any stated basis. Specific comments below provide additional detail and are each addressed in turn.

Response to Comment RI7-11
The County agrees with the quoted excerpts from the Rohde & Associates HGV South Wildfire Risk Analysis (WRA) but disagrees that the report fails to fully respond to Question 11. For clarification, the question is asking Rohde & Associates to evaluate whether the HGV South Project would place stress on the ability of fire protection, evacuation and other public safety components to provide the same services throughout the greater Harmony Grove community. The answer from the Rohde & Associates report on pages 18 and 19 indicates that fires in the area can require vast resources and that there are vast resources available to respond. Additionally, the response indicates that both fire and law enforcement agencies can respond to the types of fire emergencies anticipated in Harmony Grove. Lastly, the response indicates that the Project includes features that will considerably reduce the resources needed to protect the HGV South Project. Therefore, there is no omission in the response to Question 11.

Response to Comment RI7-12
Please refer to Response to Comment RI7-11 regarding how and where Question 11 regarding “the greater Harmony Grove community” was fully addressed. Specific to General Plan Policies LU-6.10, S-1.1, S-2.6, and S-3.6, Comment RI7-6 of the earlier email raised this question. Please refer to Response to Comment RI7-6, above, for discussion of Project consistency with these General Plan policies. All of this information comprises part of the FEIR, which will be before the decision makers during consideration.
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
</table>
| Comment Letter RI7 | **Response to Comment RI7-13**  
Comment RI7-13 consists of text excerpted from the Rohde & Associates HGV South WRA. The County agrees that this text is part of the report. No additional response is required. |

**HARMONY GROVE VILLAGE SOUTH**  
**WILDFIRE RISK ANALYSIS**  

Prepared for the Fire Marshal, San Diego County Fire Authority, by: 

**ROHDE & ASSOCIATES**  
FIRE + EMERGENCY MANAGEMENT + ENVIRONMENTAL  
OCCUPATIONAL SAFETY & HEALTH SERVICES  

April, 2016
### COMMENTS

Comment Letter RI7

The proposed community center fire Safety Zone is proposed for 5,000 square foot size with a capacity of 330 people. Given the availability and access to other community Safety Zone assets, this is felt by the consultant team to be adequate to address proposed development needs.

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.

11. What is the recommended fire/law resource allocations for wildfire structural defense within the proposed development, given expected fire behavior and community design? Will the addition of the proposed development compromise fire protection, evacuation, or other public safety components within the greater Harmony Grove community?

The Harmony Grove subdivision development has included construction of a new fire station facility within Harmony Grove. This facility is anticipated to be staffed by the Rancho Santa Fe Fire Protection District upon LAFCO annexation approval, expected in July of 2016. Rancho Santa Fe will assume primary responsibility for structure fire protection and emergency medical services, and Cal Fire will maintain primary responsibility for wildfire protection. The San Diego County Sheriff will retain primary law enforcement responsibilities, with local jurisdiction maintained by rural deputies assigned to the San Marcos Sub-Station. Highway traffic jurisdiction will continue to be managed by the California Highway Patrol.

Regional resource response to potential wildfires requires vast and multi-agency resources to mount effective and rapid defense against aggressive wildfire threats, and will include assets such as handcrews, dozers, helicopters, and airtankers, in addition to many ground engine companies. Law enforcement deployment would similarly require response from multiple agencies to manage evacuation, traffic, and security. Both fire and law agencies within the area possess diverse and robust resources and organization for addressing fires within the proposed development area.

Like most of San Diego County, fires in Harmony Grove may occur under the most adverse weather conditions, and likely occur during times of regional fire siege of multiple large fires when resource availability is compromised and limited. The proposed development’s compliance with San Diego County Wildland-Urban Interface fire codes, and the proposed enhancements contained within this report will significantly reduce the resource deployment requirements for structural defense to the proposed project.

The proposed project was evaluated for fire service protection demands as part of the greater Harmony Grove community. Recommendations for resource deployment were
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Comment Letter RI7</strong></td>
<td></td>
</tr>
</tbody>
</table>

included in the completed emergency services Wildland Urban Interface Fire Emergency plan. With proposed mitigations, good results from structural defense efforts may be expected in the proposed development, similar to those of other modern fire resistive communities in San Diego County.

12. Does community water supply infrastructure/systems adequately address fire flow demands for the proposed development during wildfire? Will the pumping infrastructure be safe from fire effects?

Fire flow data was received from the County of San Diego for system performance expected in the Harmony Grove South proposed development. The consultant review found system performance to be consistent with storage, fire flow, and distribution standards for suburban communities. 5,000 GPM will be the intended available fire flow with a minimum 40 PSI. Fire hydrants will be available every 500 feet in the project. In addition to fire flow, the applicant has committed that all residences in the proposed development will be equipped with residential fire sprinklers.

Planning for redundancy of power supply is recommended to ensure backup power in the case of utility disruption. This is usually provided through generator power delivery. This is recommended to ensure fire flows are maintained and reservoirs are capable of refilling under major emergency fire conditions.

Backup plans should be undertaken by the water authority to maintain electronic visualization of systems should primary telemetry be interrupted by power loss.

Pump rooms and their related structures and exterior areas should be maintained free of materials which are ignitable by fire branding and constructed/reinforced against fire exposure. Fuels clearance from these critical facilities should be maintained and inspected by the County for compliance.

Parking/access controls are recommended to maintain fire apparatus access to fire hydrants, and maintain adequate access and turning radius within the proposed development. Compliance with applicable fire and building code relating to these concerns has received the commitment of the applicant.

**Summary**

The applicant's proposed mitigations appear consistent with good practice to mitigate fire risks in the proposed Harmony Grove Village South development, with the following caveats:

a. Additional fuel modification is recommended where slope and the presence of chaparral fuels accentuates fire behavior potential.