

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter RI7</p> <p>From: scsuds@gmail.com Sent: Monday, April 9, 2018 4:52 PM To: Smith, Ashley Cc: Aghassi, Sarah; Horn, Bill; Ron-Roberts; Jacob, Dianne; Cox, Greg; Gaspar, Kristin; Slowick, Mark; Sibbet, David; efhgtd@gmail.com Subject: 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.) Attachments: HGVs FPP pg 34.pdf; Lilac Fire AAR pgs. 12 & D-1.pdf</p> <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> <p>Dear Ashley,</p> <p>Thank you for the opportunity to comment on the RDEIR for the Harmony Grove Village South proposed General Plan Amendment. In reviewing the publicly disclosed Project documentation as background for fellow community member comments on the greenhouse gas emissions issue related to vehicular emissions, I discovered significant errors in the Project Fire Protection Plan related to emergency evacuation.</p> <p>Please see below comments regarding a significant internal inconsistency and omission in the Harmony Grove Village South Fire Protection Plan (FPP). The errors concern the estimate of evacuation time appearing on page 34 of the FPP. Correction for these errors is likely to necessitate upgrade of the hazard impact associated with wildfire and evacuation to significant and unmitigatable, and a finding that the Project is also inconsistent with several land use and safety elements of the General Plan as described below.</p> <p>A copy of the cited FPP page (34) with the relevant sections highlighted and marked "A" and "B", respectively corresponding to comments below, is attached for your convenient reference. Also attached are copies of the pages from the Lilac Fire After Action Report cited below. The cited Harmony Grove WUIFERP is included in whole by reference.</p> <p>Sincerely,</p> <p>Scott C. Sutherland Elfin Forest Resident</p> <p><u>COMMENT RE: FPP pg.34 TEXT MARKED "A" (attached)</u></p> <p>This estimate is predicated on an <u>internal inconsistency</u> and an <u>omission</u> that cause the analysis to substantially underestimate the total evacuation time. The <u>internal inconsistency</u> is that an additional 45 minutes to allow time for "residents (to) gather belongings and leave in their vehicles" should be added to the 45 minutes required for the "evacuation protocol" in order to be consistent with the "90 minutes elapsed time" interval which explicitly includes evacuation protocol execution time and resident prep and departure time. In order to resolve the inconsistency, 45 minutes for resident prep and departure time should be added on top of the time required for execution of the "evacuation protocol" for a total time of 90 minutes not 45 minutes. <u>The omission</u> is that the time from wildfire ignition until "the time the decision is made to evacuate" is not included in the analysis. This time period is a critical data point because the HG WUIFERP Offshore Forecast Arrival Times are founded on the ignition time. Based on the time interval between ignition and evacuation protocol initiation during the most recent local fire, the Lilac Fire (Lilac Fire AAR, page</p> <p style="text-align: center;">1</p>	<p>Response to Comment RI7-1</p> <p>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.</p> <p>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.</p> <p>Response to Comment RI7-2</p> <p>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.</p> <p>Response to Comment RI7-3</p> <p>The comment is informational, indicating attachments provided with the comment. No additional response is required.</p> <p>Response to Comment RI7-4</p> <p>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.</p>

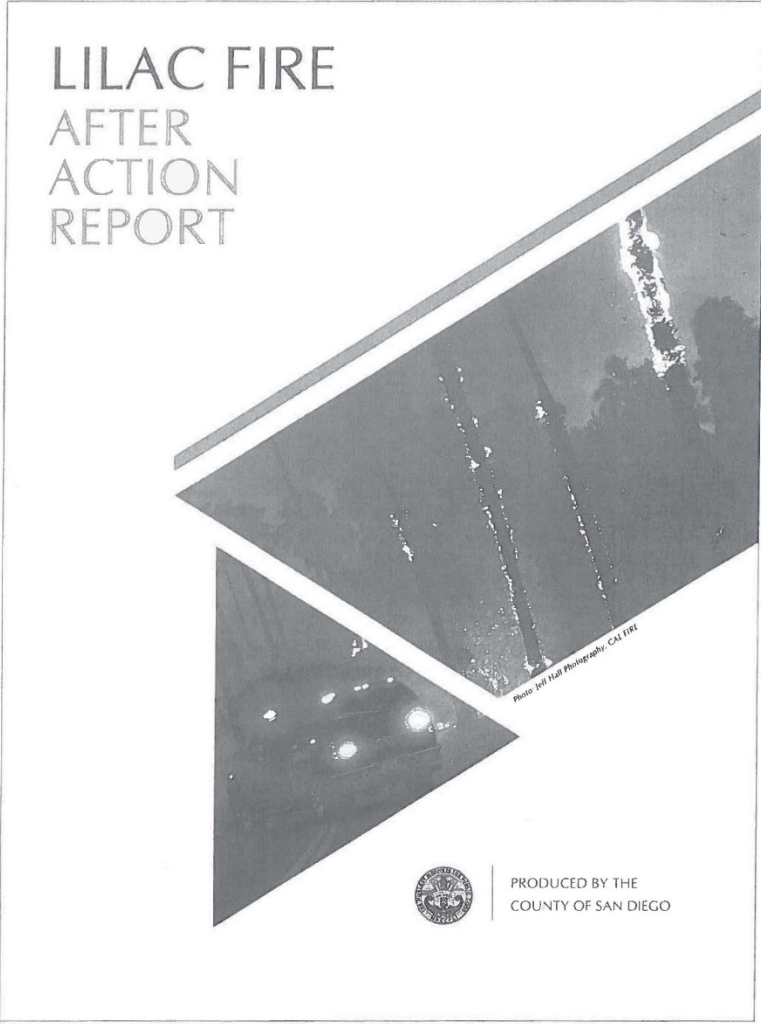
COMMENTS	RESPONSES
	<p>The FPP introduces an average timeline for evacuations that can result in up to 90 minutes from the time the decision to evacuate is made until the last residents of a community leave their driveway in their vehicles. This timeline is not easily applied universally due to the varying 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.</p> <p>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 club house 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.</p>


COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter RI7</p> <p>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 <u>1 lane</u> total evacuation time is 2'30" from evacuation protocol initiation and 3'00" from wildfire ignition.</p> <p><u>COMMENT RE: FPP pg.34 TEXT MARKED "B" (attached)</u></p> <p>For the same reasons cited above, the correct <u>2 lane</u> total evacuation time is 2'00" from evacuation protocol initiation and 2'30" from wildfire ignition.</p> <p><u>COMMENT RE: SIGNIFICANT HAZARD IMPACT AND INCONSISTENCY WITH GENERAL PLAN LAND USE AND SAFETY ELEMENTS</u></p> <p>Evaluating the emergency evacuation impact of the Project based on the corrected analysis above in conjunction with the HG WUIFERP, it can be demonstrated that the hazards associated with wildfire are significant and almost certainly unmitigatable. And, further, it can be demonstrated based on the corrected analysis above that the project is inconsistent with numerous safety and land use elements. A significant hazard impact would occur because the wildfire as simulated in the HG WUIFERP Offshore Forecast would reach 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 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 WUIFERP 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 WUIFERP Offshore Forecast at a time and under conditions similar to the Lilac Fire it could move at the same rate as the Lilac fire, much faster and farther than simulated in the HG WUIFERP 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 unmitigatable.</p> <p>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.</p> <p><i>"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."</i></p> <p>Violation of GP LU-6.10 would occur because the Project property is located in a designated high fire risk area with a designed 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.</p> <p><i>"S-1.1 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."</i></p> <p>Violation of GP S-1.1 would occur because the Project population exposed to the wildfire hazard described in the HG WUIFERP Offshore Forecast would exceed safe limits as demonstrated in the corrected analysis above, and,</p>	<p>Response to Comment RI7-5</p> <p>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.</p> <p>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.</p> <p>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</p>

COMMENTS	RESPONSES
	<p>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.</p> <p>Response to Comment RI7-6</p> <p>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.</p> <p>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, <i>Hazards and Hazardous Materials</i>, 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</p>

COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter RI7</p> <p>consequently, the density allowance required to facilitate the Project population level would fail to reflect this critical site specific constraint.</p> <p><i>"S-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."</i></p> <p>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 S-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.</p> <p><i>"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."</i></p> <p>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 S-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.</p> <p style="text-align: center;">3</p>	<p>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.</p>

COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter RI7</p> <p style="text-align: center;">Harmony Grove Village South Fire Protection Plan</p> <p>These and the other measures are discussed in detail in the following sections.</p> <p><i>Access and Parking</i></p> <p>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 G) which would provide additional capacity for evacuation. The three access roads into the project from Country Club Drive provide the ability to move vehicles out while responding emergency personnel are inbound. In an emergency, two lanes can be designated for egress while one lane would remain available to responding emergency vehicles. The project's traffic engineer states that each lane can effectively handle 1,900 vehicles per hour. There are roughly 60 existing residential units that rely on Country Club Drive as their only means of ingress/egress. With the maximum unit site plan for HGVS, an additional 453 residences would be added. If a conservative estimate of three cars per household is used (the California average is roughly 2.7 vehicles – U.S. Census Bureau 2016), there would be a total of approximately 1,584 vehicles seeking egress, assuming worst case. The actual number of vehicles would likely be much lower than this. For example, if a fire occurred during the daylight hours, many of the vehicles would already be off-site. If a fire occurred at night, families are likely to evacuate in one or two vehicles. Conservatively assuming three vehicles per household are evacuating, with one lane, all existing and proposed residences could evacuate within one hour and still be approximately 316 vehicles below the capacity. The extra evacuation lane essentially doubles the capacity and provides a significant buffer of 2,216 vehicles per hour over what would otherwise be necessary.</p> <p>In terms of evaluating how the additional egress lane assists in the movement of people during an emergency, the following analysis provides perspective. It is not uncommon for it to require up to 90 minutes elapsed time from the time the decision is made to evacuate until all evacuees have left their occupancy of origin. Included in this time is dispatch notification to activate Reverse 911, police respond to the area, Reverse 911 calls are completed, and residents gather belongings and leave in their vehicles. If only <u>1 lane</u> was available for egress at HGVS, it would be anticipated that the evacuation protocol (decision to evacuate, notification to initiate Reverse 911, police respond, and completion of Reverse 911) would take roughly 45 minutes and moving the worst case 1,584 vehicles out of the area would require just under one hour, for a total time of 1'45". This time can be reduced significantly with a second lane, as proposed for this project.</p> <p>The evacuation protocol time remains constant at 45 minutes, but the movement of 1,828 vehicles on two lanes cuts the nearly 1 hour to 30 minutes, for a savings of roughly 30 minutes for a complete evacuation when compared to the one lane scenario.</p> <ul style="list-style-type: none"> • Extension of Three Lane Road into Project. The three lane road will extend into the project such that no structure is more than 800 feet from the additional lane (Appendix <p style="text-align: right;">RI7-7</p> <p>DUDEK 34 8159-02 July 2016</p>	<p>Response to Comment RI7-7</p> <p>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.</p>

COMMENTS	RESPONSES
<p data-bbox="751 224 926 243">Comment Letter RI7</p> <div data-bbox="184 310 940 1328">  </div> <p data-bbox="982 802 1031 821">RI7-8</p>	<p data-bbox="1062 165 1425 193">Response to Comment RI7-8</p> <p data-bbox="1062 201 1990 345">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.</p>

COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter RI7</p> <p>12  2017 LILAC FIRE AFTER ACTION REPORT</p> <h2>Sequence of Events</h2> <p>Events are according to Pacific Daylight Time (PDT) and may reflect the actual time of the event or the time an event was reported.</p> <p>SUNDAY, DECEMBER 3, 2017</p> <p>1700 The San Diego National Weather Service has issued a Red Flag Warning from 3 a.m. Monday, December 4 to 12 a.m. Friday, December 8. The Red Flag Warning has been issued due to strong gusty winds and low humidity from the mountains to the coast. Winds will be 20-35 mph with gusts to 55 mph. Isolated gusts to 65 mph are possible.</p> <p>TUESDAY, DECEMBER 5, 2017</p> <p>1420 The San Diego National Weather Service has extended the Red Flag Warning to 6 p.m. Saturday, December 9. The Red Flag Warning has been issued due to strong gusty winds and low humidity from the mountains to the coast. Winds will be 25-35 mph with gusts to 55 mph. Isolated gusts to 70-90 mph are possible.</p> <p>WEDNESDAY, DECEMBER 6, 2017</p> <p>0900 The Operational Area Emergency Operations Center (OA EOC) is activated with County of San Diego Office of Emergency Services (OES) staff at a Level 1.</p> <p>1355 Extreme fire weather conditions are expected to peak tonight through Thursday and will continue into the weekend. The San Diego National Weather Service has extended the Red Flag Warning to 8 p.m. Saturday, December 9. The Red Flag Warning has been issued due to strong gusty winds and low humidity from the mountains to the coast. Winds will be 25-35 mph with gusts to 60 mph. Isolated gusts to 90 mph are possible.</p> <p>2025 The State of California Office of Emergency Services issues the following Wireless Emergency Alert (WEA): Strong winds overnight creating extreme fire danger. Stay alert. Listen to authorities.</p> <p>THURSDAY, DECEMBER 7, 2017</p> <p>0910 The American Red Cross opens (2) shelters for families affected by San Diego Gas & Electric's de-energization of power circuits: East Valley Community Center in Escondido and Bostonia Park Center in El Cajon.</p> <p>* 1115 Vegetation fire reported (later named Lilac Fire).</p> <p>* 1142 CAL FIRE confirms there is an active vegetation fire on I-15 at Hwy 76. Evacuations initiated for the nearby Rancho Monserate Country Club community.</p> <p>1143 Mandatory evacuations in the area of W. Lilac Rd. and Sullivan Elementary.</p> <p>1213 OA EOC activates to a Level 2 in response to the Lilac Fire.</p> <p>1241 Mandatory evacuations from W. Lilac to Camino Del Rey; Fallbrook High School and East Valley Community Center available as shelters.</p> <p>1242 Department of Animal Services moves trucks and trailers to support large/small animal evacuations in the area of the Lilac Fire outbreak and Bonsall community; Humane Society is responding as well.</p> <p>1243 Evacuation of Bonsall Elementary School.</p> <p>1248 Fire jumps Old Highway 395.</p> <p>1308 CAL FIRE reports that the Lilac Fire is now 100-150 acres with 0% containment.</p> <p>1326 Local Emergency Proclaimed.</p> <p>1337 Del Mar Fairgrounds opens to receive large animals.</p> <p>1345 Approximately 100-200 horses remain at Del Mar Fairgrounds. An additional 400 horses from San Luis Rey will be staying at Del Mar until May, per agreement between Del Mar and San Luis Rey Downs.</p> <p>1352 OA EOC activated to a Level 3.</p> <p>1352 San Diego County Sheriff Campaign 1: San Diego County Sheriff issues Evacuation Order via Voice Message, SMS Text, and Email, ordering contacted individuals to evacuate; residents can evacuate to Fallbrook High School, Pala Casino, or East Valley Community Center in Escondido. AlertSanDiego Contacts: 3,748; Nighttime Population: 8,311; Daytime Population: 6,984; Housing Units: 3,299; Businesses: 261.</p> <p>1357 San Diego specific WEA sent out: Dangerous fires in North SD County. Tune to local media. Call 211 for evac areas -SD OES.</p>	<p style="text-align: center;">RI7-8</p>

COMMENTS

RESPONSES

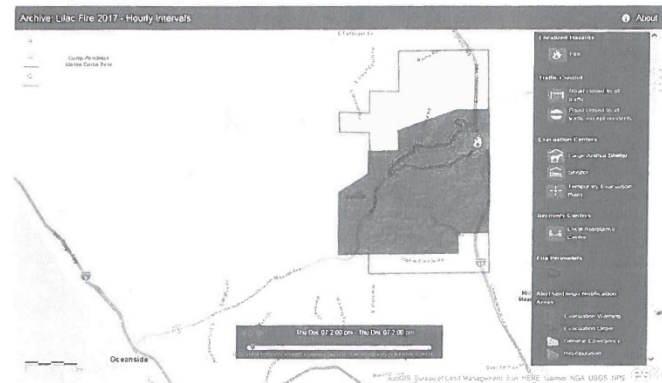
Comment Letter R17



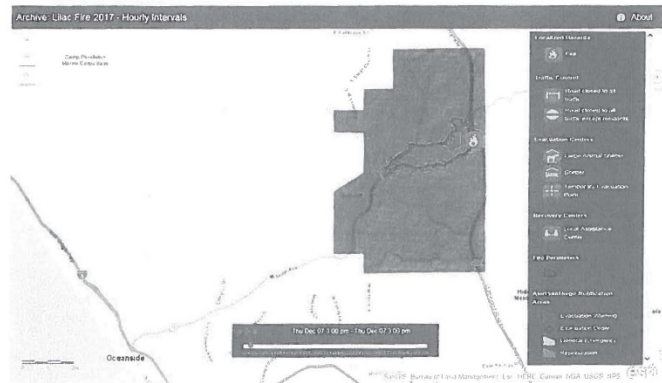
County of San Diego GIS Portal

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.

2:00pm




3:00pm



R17-8

D-1

COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter R17 Comment Letter I7</p> <hr/> <p>From: scsuds@gmail.com Sent: Monday, April 9, 2018 4:57 PM To: Smith, Ashley Cc: Aghassi, Sarah; Horn, Bill; Ron-Roberts; Jacob, Dianne; Cox, Greg; Gaspar, Kristin; Slovick, Mark; Sibbet, David; efhgct@gmail.com Subject: 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.) ADDITIONAL COMMENT Attachments: HARMONY GROVE VILLAGE SOUTH WILDFIRE RISK ANALYSIS pgs 18 & 19.pdf</p> <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> <p>Dear Ashley,</p> <p>Thank you for the opportunity to comment on the RDEIR for the Harmony Grove Village South proposed General Plan Amendment.</p> <p>In addition to the significant errors in the Project Fire Protection Plan related to emergency evacuation that I commented upon in my prior email today, I have discovered a critical omission in the Harmony Grove Village South Wildfire Risk Analysis (WRA). A copy of the relevant pages from the analysis (18 & 19) are attached and the subject section highlighted for your convenient reference.</p> <p>As you know, the analysis was prepared by Rhode & Associates for the purpose of "development of a wildland fire assessment and tactical plan for the greater Harmony Grove community,...(and)...Second, a site specific analysis of the proposed Harmony Grove Village South project to answer specific written questions posed by the County of San Diego related to application of Building/Fire Code and requested variance to existing regulations." (WRA, page 2) There are 12 such questions addressed in the WRA, and the 11th of the questions (WRA, page 18) is composed of two parts. The second part of the question is as follows:</p> <p><i>"Will the addition of the proposed development compromise fire protection, evacuation, or other public safety components within the greater Harmony Grove community?"</i></p> <p><u>The WRA omits any response to this question.</u></p> <p>The omission is critical because the answer underpins the fundamental foundational support for the fire code variance to existing regulations granted for the Project. Furthermore, the omission precludes a reasoned appraisal of related cumulative impacts on "the greater Harmony Grove community", which, consequently, have not been sufficiently addressed in the Project DEIR. Also, the omission precludes evaluation of the compliance of the Project with General Plan elements:</p> <p>LU-6.10 Protection from Hazards S-1.1 Minimize Exposure to Hazards S-2.6 Effective Emergency Evacuation Programs S-3.6 Fire Protection Measures</p> <p>Thanks again for the opportunity to comment.</p> <p>Sincerely, Scott C. Sutherland Elfin Forest Resident</p> <p style="text-align: right;">1</p>	<p>Response to Comment RI7-9</p> <p>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.</p> <p>Response to Comment RI7-10</p> <p>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.</p> <p>Response to Comment RI7-11</p> <p>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.</p> <p>Response to Comment RI7-12</p> <p>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.</p>

COMMENTS	RESPONSES
<p data-bbox="751 220 926 240">Comment Letter RI7</p> <p data-bbox="275 367 861 456">HARMONY GROVE VILLAGE SOUTH WILDFIRE RISK ANALYSIS</p> <p data-bbox="415 509 716 526"><i>Harmony Grove Village South development area</i></p>  <p data-bbox="291 1016 829 1036"><i>Prepared for the Fire Marshal, San Diego County Fire Authority, by:</i></p> <p data-bbox="396 1065 621 1133">ROHDE & ASSOCIATES</p> <p data-bbox="396 1138 774 1170">FIRE • EMERGENCY MANAGEMENT • ENVIRONMENTAL OCCUPATIONAL SAFETY & HEALTH SERVICES</p> <p data-bbox="508 1198 609 1218">April, 2016</p> <p data-bbox="934 769 993 789">RI7-13</p>	<p data-bbox="1062 167 1440 193">Response to Comment RI7-13</p> <p data-bbox="1062 203 1990 306">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.</p>

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter RI7</p> <p>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.</p> <p>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.</p> <p>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?</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The proposed project was evaluated for fire service protection demands as part of the greater Harmony Grove community. Recommendations for resource deployment were</p> <p style="text-align: center;">18</p>	<p style="text-align: center;">RI7-13</p>

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter RI7</p> <p>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.</p> <p>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?</p> <p>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 300 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.</p> <p>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.</p> <p>Backup plans should be undertaken by the water authority to maintain electronic visualization of systems should primary telemetry be interrupted by power loss.</p> <p>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.</p> <p>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.</p> <p>Summary</p> <p>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:</p> <p>a. Additional fuel modification is recommended where slope and the presence of chaparral fuels accentuates fire behavior potential.</p> <p style="text-align: center;">19</p>	<p style="text-align: center;">RI7-13</p>