


COMMENTS	RESPONSES
<div data-bbox="142 300 367 341">  </div> <div data-bbox="743 272 926 293"> <p>Comment Letter RL1</p> </div> <div data-bbox="176 401 327 492"> <p>401 B Street, Suite 800 San Diego, CA 92101-4231 (619) 699-1900 Fax (619) 699-1905 sandag.org</p> </div> <div data-bbox="361 401 468 420"> <p>April 10, 2018</p> </div> <div data-bbox="768 401 926 420"> <p>File Number 3300300</p> </div> <div data-bbox="361 456 621 560"> <p>Ms. Ashley Smith Planning and Development Services County of San Diego 5510 Overland Avenue, Suite 310 San Diego, CA 92123</p> </div> <div data-bbox="361 576 480 597"> <p>Dear Ms. Smith:</p> </div> <div data-bbox="361 615 930 657"> <p>SUBJECT: Harmony Grove Village South Recirculated Draft Environmental Impact Report</p> </div> <div data-bbox="361 673 930 859"> <p>Thank you for the opportunity to comment on the County of San Diego's Harmony Grove Village South Recirculated Draft Environmental Impact Report (EIR). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (2015 Regional Plan). These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG comments are submitted from a regional perspective emphasizing the need for better land-use and transportation coordination.</p> </div> <div data-bbox="361 876 567 898"> <p>General Plan Consistency</p> </div> <div data-bbox="361 914 930 1078"> <p>Please continue to take consistency with guiding plans for the region into consideration. In 2011, SANDAG supported the vision and goals of the County of San Diego General Plan Update, which shifted "20% of future growth from eastern backcountry areas to western communities...reflect[ing] the County's commitment to a sustainable growth model that facilitates efficient development near infrastructure and services, while respecting natural resources and protection of existing community character in its extensive rural and semi-rural communities."</p> </div> <div data-bbox="361 1096 930 1343"> <p>SANDAG supports the goals and objectives that are currently laid out in the 2011 County of San Diego General Plan, as they encourage smart, sustainable growth and reinforce the principles set forth in the 2015 Regional Plan. Other County of San Diego planning documents, such as the recently adopted Climate Action Plan, reinforce the vision and goals of the County of San Diego's General Plan. While SANDAG realizes that general plans are meant to be dynamic documents updated to reflect market forces and population growth and trends, SANDAG supports key land-use principles that preserve natural resources and limit urban sprawl. The SANDAG Smart Growth Toolbox and Smart Growth Design Guidelines provide planning, visualization, and financial tools to show how smart growth principles can be put into practice when the goals outlined in the County of San Diego's General Plan are implemented.</p> </div> <div data-bbox="216 570 315 586"> <p>MEMBER AGENCIES</p> </div> <div data-bbox="216 586 315 967"> <p>Cities of Carlsbad Chula Vista Coronado Del Mar El Cajon Encinitas Escondido Imperial Beach La Mesa Lemon Grove National City Oceanside Poway San Diego San Marcos Santee Solana Beach Vista and County of San Diego</p> </div> <div data-bbox="207 997 315 1013"> <p>ADVISORY MEMBERS</p> </div> <div data-bbox="176 1013 315 1343"> <p>Imperial County California Department of Transportation Metropolitan Transit System North County Transit District United States Department of Defense San Diego Unified Port District San Diego County Water Authority Southern California Tribal Chairmen's Association Mexico</p> </div>	<div data-bbox="1060 167 1432 193"> <p>Response to Comment RL1-1</p> </div> <div data-bbox="1060 203 1995 841"> <p>The County concurs with the description of SANDAG's 2015 Regional Plan and the policies contained within the Regional Plan. The County also agrees that the shift of 20 percent "of future growth in the County from eastern backcountry areas to western communities" reflects "the County's commitment to a sustainable growth model," that the General Plan goals and objectives "reinforce the principles set forth in the 2015 Regional Plan," that the General Plan is a dynamic document that will be "updated to reflect market forces and population trends," and acknowledges that "SANDAG supports key land-use principles that preserve natural resources an limit urban sprawl." Consistent with these introductory comments, the County continues to work to reinforce the goals and principles of the General Plan, requiring detailed consistency analyses with General Plan Element goals and policies as part of each project proposed for General Plan Amendment. For the current Project, the Draft EIR (DEIR) addressed General Plan and the Regional Plan (San Diego Forward) in Section 3.1.6, <i>Land Use</i> (Section 3.1.5 of the Final EIR [FEIR]). Elements of the Regional Plan also were discussed in DEIR Section 3.1.3, <i>Greenhouse Gas Emissions</i> (now FEIR Subchapter 2.7).</p> </div> <div data-bbox="1060 880 1995 1102"> <p>The SANDAG Smart Growth Toolbox and Design Guidelines were considered in the development of Harmony Grove Village South (HGV South.) Although these guidelines are geared towards areas with higher densities and intensities, several concepts are applicable to HGV South. The following discussion identifies how these smart growth concepts have been implemented into the Project design.</p> </div> <div data-bbox="1060 1141 1995 1364"> <p>Site Design: The Design Guidelines emphasizes how decisions are made regarding where buildings are located on a site, how they relate to the surrounding area, and how pedestrians, bicyclists, and vehicles are accommodated. Compatibility with adjacent development, establishing safe pedestrian and bicycle access, links to transit, and incorporating sustainable design practices into the landscape plan are important considerations.</p> </div> <div data-bbox="1060 1403 1995 1507"> <p>The Proposed Project is adjacent to the existing Harmony Grove Village (HGV) Specific Plan area. HGV consists of a Village Center north of Harmony Grove Road surrounded by a variety of single-family residential and recreational uses.</p> </div>

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	<p>HGV also plans for an Equestrian Center south of Harmony Grove Road across from the HGV South Project site, which is intended to accommodate horses for boarding and training as well as horse shows. Associated retail sales and temporary commercial operations, including food and beverage sales, are also approved land uses for the site as well as up to four residential units (including one care taker's unit). This area is intended to be an important gathering place within the community.</p> <p>HGV South has been designed to be compatible with HGV and contribute to the vision for the community by allowing for a variety of residential types not currently offered within HGV including multi-family homes. HGV South also strengthens connections between the HGV Village Center, County public parks, and HGV Equestrian Ranch through the establishment of a bridge over Escondido Creek, multi-use trails and pathways, and additional opportunities for social gathering through the provision of a commercial/civic zone near the center core of HGV South (located within a half-mile of the HGV Village Center). A "Center House" is planned for the commercial/civic area which would include civic uses such as a clubhouse, limited overnight accommodations, or a recreational center as well as a commercial component, such as limited food and beverage services. Exterior recreational facilities at the Center House may include a pool, spa, event lawn, family barbeque areas, and gazebo. In addition, an existing on-site remnant fireplace may be rebuilt and located in this area as a way to honor the heritage of the site.</p> <p>The landscape design provides a cohesive theme that ties HGV South to HGV. The utilization of consistent street trees and similar planting materials will provide a continuous link between HGV and HGV South, strengthening the concept that the two projects constitute one unified village. Active forms of transportation are also encouraged by enhancing the visual character of the area and providing amenities within the landscape that contribute to a pleasant and comfortable walk or bike ride.</p> <p>The Project landscape plan incorporates sustainable design features. It conserves water by employing a "Modified California Native" plant palette that reflects the natural setting and incorporates drought tolerant and native species,</p>

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	<p>utilizes reclaimed water, and implements a water efficient irrigation system. It also reduces the threat of wildfire by incorporating adequate fuel modification zones and utilizing plant materials that reflect an inherent resistance to fire. Existing drainage patterns are generally maintained and a remnant drainage that was largely eliminated from the site due to previous agricultural operations may be recreated. This feature could provide a habitat for birds and other species in the area, enhance aesthetic value, create recreational opportunities, and carry some stormwater. Paving and hardscape areas will be minimized to the extent possible to allow the landscape to retain more of its natural hydrological function.</p> <p>HGV South is located within bicycling distance (approximately 3 miles) from the closest transit stations (Nordahl Road Sprinter Station and the Escondido Transit Center). In addition, the Project will be reserving for dedication an area within the commercial/civic zone for a transit stop for bus service when a local transit line is extended to service the HGV/HGV South area.</p> <p>Not only is the Project site adjacent to HGV, but it is also located very close to several major employers, such as Palomar College, Cal State San Marcos, and Palomar Medical Center. California State University San Marcos is located less than 3 miles to the northwest, Palomar Medical Center is located approximately 2 miles to the north and the Escondido Energy and Technology Center (ERTC), an industrial/commercial, employment and services center, is located within 1 mile north-northeast of HGV South. Other nearby land uses include numerous shopping and service areas within the Cities of Escondido and San Marcos.</p> <p>Building Design: The Smart Growth Design Guidelines emphasize the need for high quality development that contains architectural features that reflect the local vernacular and are appropriate to the local climate.</p> <p>The overall architectural design concept for HGV South is to be consistent with, and complement HGV, yet establish an identity that is unique to the Project. Whereas the architectural theme for HGV is based on the Western Farmhouse/Cottage architecture tradition, the theme for HGV South is based on the Western Farm Village architecture tradition. This theme includes Western</p>

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	<p>Farmhouse/Cottage as well as other farm building references such as the Granary, Barn, and Mill. Utilizing a slightly broader architectural vernacular provides a more organic feel to the community. It allows Harmony Grove to retain its semi-rural and rural character, yet adds interest by permitting other building types that contribute to the sense that the community has evolved over time. Larger buildings, such as those that reflect granaries or mills, also allow for a wider range of housing types. Multi-family housing units would be framed within these farm-like structures.</p> <p>The HGV South Specific Plan includes architectural design guidelines to ensure high quality development. Architectural elements will be used to reduce the apparent size, bulk, and scale of proposed buildings and create an interesting and aesthetically pleasing environment. Techniques such as utilizing vertical and horizontal elements to break up building facades, incorporating variations in the roofline, reducing the presence of garage doors from the street scene by locating them on alleys, in cluster courtyards, etc., and staggering setbacks will be employed. Private spaces such as shaded porches and courtyards are encouraged. Exterior colors will complement architectural details and be respectful to the surrounding topography. The majority of structures should be monochromatic, but the use of contrasting colors used as accents in areas such as trim, shutters, and architectural elements can provide visual interest.</p> <p>The Specific Plan encourages sustainable building design and includes policies that encourage techniques such as reducing heating and cooling needs by capitalizing on passive solar energy, utilizing locally sourced, renewable, recycled, non-toxic, and/or reusable building materials, relying on renewable energy generation systems, and establishing ongoing sustainable operations and maintenance activities. In addition, 100 percent of the Project's electrical/energy needs will be satisfied through renewable solar power.</p> <p>Multimodal Streets: The Smart Growth Design Guidelines emphasize the need for streets that meet the needs of everyone, not just vehicular traffic.</p> <p>The primary point of access to HGV South is via Country Club Drive. The west side of Country Club Drive is planned by the HGV Specific Plan and the</p>

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	<p>County’s Community Trails Master Plan to include a 10 foot north-south multi-use trail. The trail is planned to cross over Escondido Creek, continue along the length of the HGV Equestrian Ranch property, and cross over Country Club Drive at the southern entrance to HGV South to connect to the subregional and regional trail system. This trail is intended to accommodate equestrian, bicycle, and pedestrian users. A 5-to-6-foot pathway planned by HGV South is accommodated along the east side of Country Club Drive. This pathway would provide connections to the commercial/civic uses, a planned equestrian hitching post, the Lake Hodges Trail, and a public trailhead staging area for the Elfin Forest Trail. Additional rural trail connections are provided between the Lake Hodges Trail and the primitive Elfin Forest Trail.</p> <p>To further encourage multi-modal forms of transportation, Country Club Drive would be designed to include additional landscaping, street trees, and interpretive signage. Marked crosswalks connecting the east and west sides of Country Club Drive would be located from each of the HGV South entries to the future multi-use trail on the west side of the road to accommodate pedestrians/equestrians crossing the road.</p> <p>It is anticipated that the roadways serving HGV South may be painted with sharrows to indicate that bicyclists share the roadway with vehicles. In addition, bicyclists can utilize the multi-use trails. The private roads that wind throughout HGV South are also designed with four-foot wide pedestrian walkways.</p> <p>Transit Stations: The Smart Growth Design Guidelines encourage the availability of transportation options that provide convenient alternatives to the personal automobile.</p> <p>There currently is no bus service to Harmony Grove Village. However, the Project will reserve for dedication an area within the commercial/civic zone for a transit stop for bus service when a local transit line is extended to service the area.</p> <p>Civic Buildings: Civic buildings, such as recreation centers, function as the “heart” of a neighborhood and create enjoyable gathering places.</p>

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	<p>As previously discussed, HGV South includes a commercial/civic zone. A “Center House” which would include both civic and commercial uses would be located in this area. An approximately 0.8 net acre private park would also be located within the commercial/civic zone. The park may contain a historic wood burning fireplace that may be restored to working order. It may also be developed with a pool/spa area, barbeque/picnic area, a play field, restrooms, gazebo, and/or other similar park uses. Community gardens are also proposed. These areas are intended to be important gathering places in the community.</p> <p>Parks and Civic Space: Public open spaces contribute to the attractiveness, health, and environmental quality of a neighborhood. HGV South is located just north of the Del Dios Highlands County Preserve. The Project accommodates multi-use regional and subregional trails that connect to this open space area. The Project has been designed to preserve the largest block possible of contiguous open space adjacent to the preserve.</p> <p>A County park, currently under construction, is contiguous (i.e., located just across the street and within 300 feet) of HGV South. The 2.8-acre site provides an additional community gathering place that is focused on equestrian exercise activities. An additional 2.9-acre Community Park area, currently under construction by HGV, is located west of the equestrian facilities and includes recreation and parking.</p> <p>Within HGV South, approximately 4 acres of public and private parks are planned to be developed including recreational community gardens, a dog park, play fields, basketball court, horse shoe pit, barbeque areas, picnic tables, children’s play area, and/or informal play areas. The parks within HGV South and HGV will be connected by a series of trails as well as a fitness circuit consisting of various exercise stations. Public parks will be dedicated to the County of San Diego while private parks will be operated and maintained by a homeowner’s association.</p> <p>Parking: A well designed place must accommodate parking while also creating a pedestrian-oriented environment.</p>

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	<p>Homes within HGV South are designed to minimize the presence of garages along the streetscape by locating them on alleys, in cluster courtyards, and partially underground spaces. Street parking would be provided for visitors. Bicycle parking may be provided at the Center House. In addition, designated parking would be provided at the Center House for shared vehicles and clean air vehicles.</p>


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<p style="text-align: right;">Comment Letter RL1</p> <p>In evaluating the environmental impacts of the Harmony Grove Village South Project, please consider whether the project is consistent with the land-use and transportation goals of the County of San Diego General Plan, the Climate Action Plan, and the 2015 Regional Plan.</p> <p>SANDAG Regional Growth Forecast</p> <p>The current SANDAG Regional Growth Forecast (Series 13) does not assume the Harmony Grove Village South Project. SANDAG is in the process of updating the Regional Growth Forecast (Series 14). The Preliminary Series 14 Regional Growth Forecast does not assume the Harmony Grove Village South Project. It is anticipated that the Series 14 Regional Growth Forecast will be accepted for planning purposes this summer and finalized in October 2019.</p> <p>Transportation Demand Management</p> <p>iCommute, the SANDAG Transportation Demand Management (TDM) Program, can assist with promotion of regional TDM programs and services. Such programs and services include the SANDAG Vanpool Program, the Guaranteed Ride Home service, support for carpooling, and bike encouragement programs. The iCommute Employer Services Program works with employers to develop and implement customized commuter benefit programs for their employees to encourage the use of transportation alternatives to driving alone. More information on these programs can be found at iCommuteSD.com.</p> <p>Active Transportation</p> <p>SANDAG has the following suggestions and/or clarifications to the active transportation elements of the proposed Harmony Grove Village South Project and Draft EIR:</p> <ul style="list-style-type: none"> • Please indicate where pedestrian crossings will be painted. These crossings are important to indicate where people should cross the street and to indicate that drivers should slow down. • Please consider widening the sidewalk from 4 feet to 5 feet. While 4 feet meets the minimum standards for sidewalk width, it does not comfortably allow for two people to walk side by side. Additionally, adding space between the sidewalk and the street, particularly if that space is landscaped, can help to improve comfort for walking. • The Harmony Grove Village South Project currently proposes that the trail entrance be located on the west side of Country Club Drive, which would require pedestrians to cross the street to enter Harmony Grove Village South. This presents a safety concern, as drivers may not know to expect people walking, biking, or riding horses across the street. Please consider including warning devices, such as Rapid Rectangular Flashing Beacons, along with appropriate striping and signage at entrances into Harmony Grove Village South. • The Harmony Grove Village South Project calls for shared-lane markings, or sharrows, along internal roadways. SANDAG encourages providing bike lanes or buffered bike lanes on the internal loop road to increase comfort and encourage ridership. <p style="text-align: center;">2</p>	<p>Response to Comment RL1-2</p> <p>It is acknowledged that the Proposed Project is not included within the Regional Growth Forecast, as it proposes an amendment to the adopted General Plan that provides the land use assumptions used by SANDAG. The County will continue to provide updates to SANDAG relevant to their regional growth forecasts. Should the Proposed Project (Harmony Grove Village South; HGV South) be approved, staff will provide that information for incorporation into Series 14 as soon as possible.</p> <p>Response to Comment RL1-3</p> <p>This comment relates to SANDAG and general Transportation Demand Management (TDM) programs. TDM programs often include transportation planning elements such as: use of priority techniques for high occupancy vehicles (HOVs), parking regulation, efforts to shift when travel occurs, promotion of telecommuting, transit service improvements, use of pricing techniques on HOV lanes on freeways, etc. These are most frequently applicable to state road planning agencies, metropolitan planning agencies able to charge for parking, or to employers providing job opportunities that would support a substantial number of workers travelling to/from a specific locale at specified hours. The Project does not propose, or plan, elements related to being a large-scale employer. The Project would encourage carpooling. As described in Subchapter 2.7 Project design features (PDFs), “The HOA will provide informational materials on SANDAG’s rideshare programs like icommute,” The Project also supports bike riding and pedestrian activities between HGV South and HGV through connections to the HGV multi-purpose trail on Country Club Drive and on-site wide streets with low use rates, sharrows, and pedestrian pathways. Finally, the Project would be “transit ready.” A turn out for a future bus stop would be incorporated into the Center House use area. This latter commitment has been incorporated into Project PDFs and is included in the Final EIR on Table 1-2, <i>Project Design Features</i>, in Subchapter 2.7, and in Chapter 7.0, <i>List of Mitigation Measures and Project Design Features</i>. No additional response is necessary.</p>

Response to Comment RL1-4

SANDAG proposes several project design items. These are individually addressed below.

- Relative to the pedestrian crossings and the need to show where individuals would cross and indicate where drivers should slow, the pedestrian crossing are shown on the Project Vesting Tentative Map. Sheet 3 shows the crosswalk at the Harmony Grove Road intersection with Country Club Drive, and Sheet 4 shows the proposed crossings on Country Club Drive at each Project entry driveway.
- The comment asks for consideration of widening sidewalks from 4- to 5-feet in width, and to add space between the sidewalk and street. As shown on Figure EIR 1-14a, the Project proposes a 4- to 5-foot-wide landscaped parkway between Country Club Drive and a 5- to 6-foot-wide pathway. Within the Project, EIR Figures ~~1-16b and 1-16d~~ shows a 5-foot-wide trail and 18 feet of parking between travel lanes and the trail for three- and two-lane private drives, and Figure 16b shows a 4.5-foot trail. EIR Figures 1-16c and 1-16e depict 4- to 6-feet wide trails adjacent to 4- to 6-feet-wide landscaped parkway. During final design, potential widening of the path into the parkway will be reviewed for these latter two road types with trails. Figures 1-16f shows a 5-foot trail (widened from 4-feet in width in the DEIR). Only one small street at the northeastern extent of the Project, accessing a maximum of 10 homes, ~~showed~~ no trail in the DEIR, or trail of only 4 feet in width. Figure 16-g shows that that pedestrian trail has now been extended to the section of road previously without a trail.
- This comment states that the Project proposes location of a multi-purpose trail on the west side of Country Club Drive. This is not correct. The trail location on the west side of Country Club Drive is not proposed by the Project but was evaluated and approved prior to the Project as part of the HGV EIR certified in 2007 and as indicated on the plot plan for MUP 04-014 associated with that project's Equestrian Ranch. An easement was dedicated on the adjacent HGV property's final map. Please also note that pedestrians have the option to cross to the east side of Country Club Drive at the signalized intersection with Harmony Grove Road, and travel down the east side of Country Club Drive. Regarding safety, please refer to bullet two of this response

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	<p>regarding the striping of crossings. Also, pedestrian movement between HGV South and the trail may legally occur at the intersection of Country Club Drive and the Project's southernmost entrance via pedestrian crossings as shown on Sheet 4 of the TM, as noted above. The Project is in fact considering the installation of warning devices such as Rapid Rectangular Flashing Beacons along with appropriate striping and signage to provide drivers with additional awareness of potential for people walking, biking or riding horses across the street. These measures will be coordinated with and developed to the satisfaction of County DPW, as appropriate and necessary.</p> <ul style="list-style-type: none"> • The preference for bike lanes over sharrows is noted. These are low volume roads that are designed with wide widths, and have undergone detailed review by County Department of Public Works staff. With regard to Country Club Drive in particular, the multi-purpose trail along HGV ultimately will accommodate bike riders if they prefer to be off road. No change to Project plans is required.

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<p style="text-align: right;">Comment Letter RL1</p> <p>Other Considerations</p> <p>SANDAG has a number of additional resources that can be used for additional information or clarification on smart growth, TDM, and active transportation. The following resources can be found at sandag.org:</p> <ul style="list-style-type: none"> • Riding to 2050, the San Diego Regional Bike Plan • Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region • Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities • Trip Generation for Smart Growth • Parking Strategies for Smart Growth • Designing for Smart Growth, Creating Great Places in the San Diego Region <p>When available, please send any additional environmental documents related to this project to:</p> <p>Intergovernmental Review c/o SANDAG 401 B Street, Suite 800 San Diego, CA 92101</p> <p>SANDAG appreciates the opportunity to comment on the County of San Diego's Harmony Grove Village South Recirculated Draft EIR. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.</p> <p>Sincerely,  SETH LITCHNEY Senior Regional Planner</p> <p>SL/KHE/kwa</p> <p style="text-align: center;">3</p> <div style="position: absolute; right: 50px; top: 280px;"> RL1-5 </div> <div style="position: absolute; right: 50px; top: 470px;"> RL1-6 </div>	<p>Response to Comment RL1-5</p> <p>This comment provides a list of SANDAG resources available to applicants and design teams during initial project planning. The resources are acknowledged; they were reviewed as appropriate during Project design.</p> <p>Response to Comment RL1-6</p> <p>This conclusion comment provides contact information. It is noted and appreciated by the County.</p>