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Comment Letter RO3 Elfin Forest Harmony Grove Town Council Keeping it Rural 20223 Elfin Forest Road Elfin Forest, CA 92029 2018 Board Members Jacqueline Arsivaud-Benjamin, Chair JP Thebenge, Vice Chair Jan Denny, Secretary Sheri Powers, Treasurer Eric Anderson Jon Dunner Shelley Fontaine Angelique Hartman Scott Sutherland April 9, 2018 Ms. Ashley Smith Land Use & Environmental Planner Planning & Development Services 5510 Overland Avenue, Suite 310 San Diego, CA 92123 E-Mail: Ashley.Smith2@sdcounty.ca.gov 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.) Dear Ashley: Thank you for the opportunity to comment on the RDEIR for this General Plan Amendment. This letter supplements that sent by our law firm, Shute, Mihaly and Weinberger, as well as the spreadsheet submitted as "Wildfire Evacuation Cumulative Impact.pdf". RO3-1 We continue to stress the unconscionable danger approval of this project would expose current and future residents to in the next wildfires. RO3-2 Our previous comment letter requested a full evacuation scenario analysis prior to staff recommendation and Planning Commission hearing, and we are submitting the attached in Exhibit A as our best effort based on review of the FPP, the WUIFERP, the MRO Traffic Analysis Report, the USDOT FHA Office of Operations Traffic Analysis Toolbox Volume VI, and the Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Plan ANNEX Q Evacuation, October 2010, V. Transportation, Determination of Evacuation Times, page 37. RO3-3 We request that the County verify the assumptions made to derive a more accurate rate of entrapment and number of residents and horses likely to become victims of entrapment in a wildfire evacuation. Without that data, decision makers and County staff have no basis to make a finding of Less than Significant for Wildland Fire Hazards Cumulative Impact Analysis in the DEIR Hazards and Hazardous Materials section. RO3-4 The DEIR Hazards and Hazardous Materials Cumulative Impact Analysis finding that "impacts from wildland fire hazards would be less than significant" (DEIR at 3.1.4-29) is invalid because RO3-5	**Response to Comment RO3-1** 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). 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 introduce some comment elements that vary in specifics from those received on the DEIR. As such, responses are provided below. Specific to information in Comment RO3-1, it is noted as informational, and does not raise new issues with the EIR or its analysis. **Response to Comment RO3-2** The concerns in this comment provide the opinion of the commenter, and do not raise new issues with the DEIR or its analysis. **Response to Comment RO3-3** This comment was previously submitted; please refer to DEIR Responses to Comments Letter O6 of this FEIR. In summary, the Harmony Grove Village South (HGV South) Project's evacuation during a wildfire event was summarized in the accepted Fire Protection Plan (FPP) (Dudek 2017). That analysis considered a worst-case scenario where the entire development required evacuation and resulted in an estimated evacuation timeframe of up to 2.25 hours or more, depending on several factors that could affect traffic flow, which could double that timeframe. Please see the Global Responses to Fire Hazards for a detailed summary of HGV South fire safety measures. In addition, the Project has now also prepared a separate Wildfire Evacuation Plan (Evacuation Plan) (Dudek 2018), which is on file with FEIR documents. The Evacuation Plan uses previously published information from many of the sources listed by Elfin Forest Harmony Grove Town Council in its comment letter. The analysis compares wildfire spread rate scenarios with evacuation timeframes, and concludes that for some fire events, there would be time available to evacuate the Project. Other events, such as those that ignite closer to the Project and include extreme fire weather, may not allow time to evacuate

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	the Project. In this scenario, contingency options are available, as detailed in the FPP (Section 5.2.1.2), the EIR (see particularly the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access in Chapter 8) and the Evacuation Plan (Section Figure 2, Sections 3.3 and 6.3). The Evacuation Plan also addresses the surrounding area (Section 4.1.1.2) including Harmony Grove, Eden Valley, and Elfin Forest by indicating that in some wildfire scenarios, HGV South could add up to 1,584 vehicles to a mass-evacuation, potentially affecting some evacuation scenarios. However, it goes on to indicate that when there is time to evacuate the entire area, HGV South would likely be evacuated along with the remainder of the population. If it is determined that there would not be enough time for a mass evacuation, HGV South, along with Harmony Grove Village (HGV), and potentially other new communities, would not be automatically evacuated as they offer contingency options to shelter in place. These communities would also be available to evacuees who are residents within the area. The Evacuation Plan further identifies improvements in the area that are likely to result in improved evacuations, including the new evacuation route Harmony Grove Village Parkway, the bridge over Escondido Creek, the new fire station, and the large HGV development with its road network and areas where existing Harmony Grove area residents could reach temporary refuge if roadways were considered less safe. **Response to Comment RO3-4** The County disagrees with the provided entrapment analysis conclusion that the less than significant finding is not supported by substantial evidence and that the comment provides new information. The County has reviewed the provided population estimates and potential evacuation scenarios and concur that they appear accurate, including a wide range between the low and high estimates. The analysis is consistent with analysis conducted within the Project's FPP (Dudek 2017) and the County's WUIERP and Wildland Fire Risk Analysis (Rohde & Associates 2017). The most significant omission from the comment's provided entrapment 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 versus evacuation (HGV South,

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	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 (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 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. The analysis provided in the DEIR and its technical appendices, along with independent focused analysis of the area as discussed in this FEIR, are sufficient for CEQA purposes. Therefore, the impact conclusion of less than significant for wildfire hazards has been substantiated and no changes to the FEIR are warranted. **Response to Comment RO3-5** The County disagrees that the DEIR's impact conclusion is invalid and the commenter does not provide evidence to the contrary within this comment. Please refer to Response to Comment RO3-3 regarding the assertion that the DEIR's analyses is not reasonable or realistic. The analyses provided in the various Project and County studies informing the DEIR's impact conclusions result in a similar conclusion for evacuation timeframes as the comment's entrapment analysis. Please refer to Response to Comment RO3-4 for response to the contention that analysis has not been conducted that considers evacuating all residents and animals all the way to safety. Options for safety are currently present at HGV, and will increase as that project continues to build out. HGV and the Proposed Project locations are closer to existing residents than is represented in the comments. Residents in new communities could be directed to shelter in their protected homes, leaving the area's roads to residents from vulnerable areas with older construction and lack of managed and maintained defensible space. Alternatively, if residents are evacuated, they will follow their practiced "Ready, Set, Go!" model (FPP and Evacuation Plan) and evacuate. Delays related to livestock evacuation based on additional large vehicles

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	carrying horses or other market animals would not occur from HGV South as the Project does not propose and would not permit large animals housed on-site. Late evacuees from currently existing residents would have available to them the option of using the new communities as their evacuation destination, resulting in reduced travel distances, reduced travel times, and reduced potential for entrapment.

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Comment Letter RO3 it is not supported by objective evidence regarding the cumulative time to evacuate all the way to safety all residents and animals from the affected area, which includes Harmony Grove, Eden Valley, Hidden Hills and Elfin Forest, and is unreasonable because an analysis of cumulative impacts to emergency evacuation access under a realistic worst case scenario, as described below, would result in a significant impact that may be infeasible to mitigate. RO3-5 Failure to conduct such an analysis, or performance of the analysis using inaccurate data, or on the basis of an inferior worst-case scenario, would represent a failure of the County to exercise fundamental best practice disaster planning and, consequently, failure to properly provide for the safety of residents and failure to "ensure that development accounts for physical constraints and the natural hazards of the land" in violation of General Plan Guiding Principle 5. RO3-6 Sincerely, Jacqueline Arsivaud Chair, Elfin Forest Harmony Grove Town Council 2	**Response to Comment RO3-6** The County disagrees that the DEIR's impact conclusion is not based on valid analysis, relies on flawed input, and did not analyze a worst-case scenario and that General Plan Guiding Principle 5 has not been adequately considered. Please also see Response to Comment RO3-7, below, regarding worst-case scenario analysis.

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Comment Letter RO3 **Wildfire Evacuation Cumulative Impact Analysis per Harmony Grove WUIFERP Offshore Forecast** for Communities Served by Harmony Grove Road- Country Club Drive-Elfin Forest Road Egress Corridor at Full Zoned Buildout by Right with HGVS & Valiano GPAs **LOW** estimate* / **HIGH** estimate** — **Country Club Drive is the only reliable route to safety:** *"All routes may be dangerous during fire except Country Club Drive or Harmony Grove Village Parkway"...."Use Country Club Dr. as primary route." HG WUIFERP* **Egress Route Data** 3 — Egress routes: Harmony Grove Road (HGR)/HGV Parkway, Country Club Drive, Elfin Forest Road 1 — Reliably safe route to safety per HG WUIFERP: Country Club Drive (CCD)*** 2.6 — Miles: route length via CCD from HGR/CCD to Auto Park Way/West Mission Road 190 — Jam density per mile for CCD estimated per FHA Off. of Ops. Traffic Analysis Toolbox Vol.VI**** 494 — Jam density from HGR/CCD via CCD to Auto Park Way/West Mission Road 1500 — Hourly vehicle capacity of CCD per traffic engineer (MRO Engineers 6/1/17) **Residence Data** 239 — Harmony Grv residences est.: existing @ 100 + HGVS zoned: 119 + add'l zoned: 20 218 — Eden Valley residences est.: existing @ 80 + Valiano zoned: 118 + add'l zoned: 20 110 — Hidden Hills residences est.: existing @ 100 + add'l zoned: 10 350 — Elfin Forest residences est.: existing @ 300 + add'l zoned: 50 742 — Harmony Grove Village residences by GPA 334 — Harmony Grove Village South residences additional by GPA (453 - 119 zoned/sewer per DEIR) 262 — Valiano residences additional by GPA (380 - 118 zoned/sewer per DEIR) 1905 / 2255 — Total evacuating residences at est. full zoned build out by right w GPAs **Demographic Data** 5715 / 6765 — Evacuating people @ 3 per residence 620 / 820 — Horses est.: existing @ 400 + add'l by right @ 200 + add'l by GPA(HGV:118/V:102) @ 220 **Vehicle Data** 3810 / 6765 — Vehicles: **LOW** OES: avg occupants/vehicle = 1.5 **HIGH** FPP:vehicles/house= 3 310 / 410 — Horse trailers @ average 2 horses per trailer 4120 / 7175 — Total evacuating vehicles including cars, trucks and horse trailers RO3-7	**Response to Comment RO3-7** Please refer to Responses to Comments RO3-3 through RO3-6 of this letter regarding the analysis. Further, the entrapment analysis in the comment assumes that only Country Club Drive is available to evacuees and it assumes a four hour delay until fire arrival as part of its analysis. Neither of these conditions is considered worst-case, as it is possible that a fire could ignite closer to the community with shorter time until arrival and that all roads could be unusable. This worst-case scenario was contemplated in the Project's FPP and Evacuation Plans and contingency options were designed into the Project to avoid impacts under this scenario. The benefit of HGV South contemplating this scenario along with the HGV buildout is that there would be two large areas available to evacuees that can provide a contingency to remaining on a potentially exposed roadway in the event of short-notice and insufficient time for evacuation. This condition exceeds many community's options for evacuation and contingencies to evacuation. (It is also noted that the scenario provided in the comment notes that the Project could contain 119 units "by right." Although not pertinent to the discussion of worst-case scenario with the full Project buildout, it is noted that the EIR actually says that the existing General Plan land use designation is for SR 0.5, or a potential parcel density of up to 220 units on 110 acres, for general planning purposes.) Regarding the assumption that only Country Club Drive would be available in a wildfire scenario, it must be noted that there are scenarios where this would be true, but there are many more scenarios where all routes would be available. There are also scenarios where two or three routes would be available or some combination of availability and unavailability for periods of time. In fact, the Rhode & Associates Report indicates that there are four potential evacuation routes available for ingress/egress during evacuations. The conclusion of that report's analysis was: "*In contrast, the consultant staff and public safety officials who participated in the field tour of the site unanimously agreed that the site has 4 [sic] potential routes of egress during evacuation, two with strong viability*." There are four available evacuation routes and it is speculative to assume that only one evacuation route would be available during a fire event. It is notable

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	that the Harmony Grove area is unusual in that it offers up to four potential evacuation routes. Many communities approved and built in the wildland urban interface and Very High Fire Hazard Severity Zones include fewer. Having four potential evacuation routes provides options during early stages of evacuations, depending on the type of emergency and the level of situation awareness. The multiple evacuation routes provide travel options to the north, east, and west, although if a wildfire evacuation is in process, the fire behavior and movement will need to be considered before traffic is directed to leave the Project area. In addition, with the development of HGV and HGV South, there are contingency options that would allow temporary refuge for firefighters and—in a rare emergency that eliminated travel on all four evacuation routes—the ability to keep residents within these ignition-resistant communities and move legacy residents whose homes may not be as defensible, into these communities for a temporary period until it is safe to evacuate the area or return to their homes. Please see the Global Responses toAdequacy of Emergency Evacuation and Access in FEIR Chapter 8.0, and pages 33, 38, and 39 of the Project's FPP for more information regarding this contingency option. The Project's DEIR and FPP analysis considered a worst-case evacuation scenario where all evacuation routes were considered unavailable. Additionally, the HGV South Evacuation Plan considers in its analysis the greater HGV area and provides analysis related to area improvements that provide evacuation contingency options. Additional, region-wide analysis is considered beyond the scope of a Project-specific analysis. Please also note that region-wide plans (i.e., region-wide evacuation plans) are not subject to individual development CEQA documents; these are greater planning efforts. As stated in the DEIR (2017:3.1.4-14, 15): *The Unified San Diego County Emergency Services Organization has the primary responsibility for preparedness and response activities, and addresses disasters and emergency situations within the unincorporated area of San Diego County. The County of San Diego Office of Emergency Services (OES) serves as staff to the Unified Disaster Council (UDC), the governing*

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	body of the Unified San Diego County Emergency Services Organization. *Emergency response and preparedness plans include the Operational Area Emergency Response Plan and the San Diego County Multi-Jurisdictional Hazard Mitigation Plan. Both of these plans develop goals and objectives for OES in regards to large-scale natural or man-made disasters.* *The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan provides the framework for emergency response throughout the County, including at the Project site. It includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas.* Based on all of these considerations, no additional analysis is required.

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Evacuation Time Data			
		4	Hours from wildfire ignition to fire reaching CCD (HG WUIFERP Offshore Forecast)
		0.3	Hours to clear jam density @ CCD flow rate + [ ] hour safety margin
		3.7	Hours safe evacuation window from wildfire ignition time
		0.5	Hours from wildfire ignition to evacuation order initiation (per Lilac Fire AAR pg.12)
		1.5	Hours from evacuation order initiation to resident departure***** (per FPP pg 43)
2.5	4.5		Hours evacuation traffic time required to evacuate entire population
4.5	6.5		Hours from wildfire ignition required to evacuate entire population
-0.9	-2.8		Hours evacuation time deficit
Entrapment Data			
19%	44%		Entrapment rate
1295	2951		People entrapped
119	358		Horses entrapped

Notes

* OES vehicle estimate method *excluding* Elfin Forest. OES method assumes 1.5 average occupants per evacuating vehicle (Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Plan ANNEX Q, Evacuation, October 2010, V. Transportation, Determination of Evacuation Times, page 37. https://www.sandiegocounty.gov/oes/emergency_management/protected/docs/ 2010_Complete_Plan_ w_Annexes.pdf). Elfin Forest excluded to model scenario where egress for Elfin Forest residents via San Elijo Hills Road is not compromised.

** FPP vehicle estimate method *including* Elfin Forest. HGVS FPP assumes 3 vehicles per residence based on 2.7 avg vehicles/residence in CA. (FPP pg. 34) Elfin Forest included to model scenario where egress for Elfin Forest residents via San Elijo Hills Road is compromised as occurred during Cocos Fire. San Elijo Hills Road was compromised during the Cocos Fire by gridlock and access to the road from Elfin Forest Road was blocked by physical baracades.

*** East bound egress via Harmony Grove Rd/HGV Pkwy and southwest bound egress via Harmony Grove Rd/Elfin Forest Rd are excluded as evacuation routes in this planning scenario because ***It cannot be certain that these routes will not be compromised by fire***. Regarding east bound routes: these routes are specifically excluded because, per the HG WUIFERP Offshore Forecast, fire would arrive at Harmony Grove Road and Harmony Grove Village Drive east of Harmony Grove in one to two hours from ignition. As the time from ignition to resident departure exceeds two hours, these roads are not usable evacuation routes under this scenario.
Regarding the southwest bound route: this route via Harmony Grove Road/Elfin Forest Road is specifically excluded because the HG WUIFERP Primary Evacuation Plan specifically states, "Do not use Harmony Grove Rd. either east or west of Harmony Grove unless *certain* it will not be compromised by fire." Based on the risks associated with this route refered to in the HG WUIFERP, there can be ***NO certainty*** that the southwest bound route will not be compromised by fire. The HG WUIFERP refers to the fire risk associated with this route as follows: "serious entrapment threats along Escondido Creek..." (Response Safety); "Harmony Grove Rd. either E/W of Harmony Grove....will be dangerous during a moving fire " (Potential Choke Points/Entrapments); "Fires may burn with extreme behavior, high rates of spread, & long range spotting " (Expected Fire Behavior); and "All routes may be dangerous during fire except Country Club Dr. or Harmony Grove Village Parkway" (Access). Harmony Grove Village Parkway does not continue all the way to safety. Because of this, and because the WUIFERP designates Country Club Drive the "primary route"..."into urban areas to the North & East" (Safety Zones/Temporary Safe Refuge Areas), and because Country Club Drive is the only route not designated as dangerous in the WUIFERP that continues all the way to safety, Country Club Drive is the only egress route used in this evacuation planning scenario.

**** USDOT FHA Office of Operations Traffic Analysis Toolbox Volume VI https://ops.fhwa.dot.gov/publications/fhwahop08054/sect4.htm Note: jam density ref. for freeway and may be significantly greater for a light collector such as CCD

***** "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 evacueas 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." (FPP pg 43)

RO3-7

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Comment Letter RO3 **From:** Carmen J. Borg <Borg@smwlaw.com> **Sent:** Thursday, June 1, 2017 9:19 AM **To:** Scott Sutherland <scsuds@roadrunner.com> **Cc:** J Arsivaud <j.arsivaud@gmail.com> **Subject:** RE: Roadway Hourly Carrying Capacity Scott, This from our traffic consultant. ---- According to the *Highway Capacity Manual* (Transportation Research Board, 2010): "The capacity of a two-lane highway under base conditions is 1,700 pc/h [passenger cars/hour] in one direction, with a limit of 3,200 pc/h for the total of the two directions." However, base conditions include: • Lane widths of 12 feet or greater, • Shoulders 6 feet or wider, • No no-passing zones, • All passenger cars (i.e., no trucks or RVs), • Level terrain, and • No impediments to through traffic (e.g., traffic signals or turning vehicles). I did a quick trial-and-error analysis, based on the following inputs, which I think better correspond to Country Club Drive: • Lane width: 10 ft. (20 ft. total width) • Shoulder width: 0 feet • No-passing zones: 100%, • Trucks and RVs: 2%, • Both level and rolling terrain (2 analyses), and • No impediments to through traffic (e.g., traffic signals or turning vehicles). Regardless of whether I treated Country Club Drive as level or rolling, a flow rate of 1,500 vehicles/hour resulted in a volume/capacity (V/C) ratio of 1.00. RO3-8	**Response to Comment RO3-8** The email from Carmen Borg to Scott Sutherland regarding Country Club Drive is noted. It provides generic traffic capacity estimates based on the Highway Capacity Manual (Transportation Research Board 2010). The comment indicates an estimate that each Country Club Drive travel lane provides capacity for 1,500 vehicles per hour. This contrasts with the HGV South FPP which indicates up to 1,900 vehicles per hour based on local traffic engineer input. Beyond information based on local knowledge, Ms. Borg's comments also do not appear to take into account the fact that a substantial portion of County Club Drive south of Escondido Creek would be improved to three lanes by the Project, and that portions of Country Club Drive north of Escondido Creek are already three-lanes wide as part of HGV improvements. (Harmony Grove Road within HGV also has wider pavement widths.) The County acknowledges the informational comment, notes its discrepancy in vehicles per hour capacity, and defers to the local traffic consultant data used in the FPP due to its more accurate estimation than a generic national highway estimate. No revisions to Project analyses on this point are required.