

COMMENTS	RESPONSES
<p style="text-align: center;"><b>Comment Letter No. PCO6</b></p> <p>May 24, 2018</p> <p>Patricia Borchmann, President Escondido Chamber of Citizens (ECOC) 1021 Madison Avenue Escondido, CA 92026</p> <p>County of San Diego Planning Commission c/o Ashley Smith – Project Contact: <a href="mailto:Ashley.Smith2@sdcounty.ca.gov">Ashley.Smith2@sdcounty.ca.gov</a> <a href="mailto:JeRae@sdcounty.ca.gov">JeRae@sdcounty.ca.gov</a> <a href="mailto:sarah.ghassai@sdcounty.ca.gov">sarah.ghassai@sdcounty.ca.gov</a> <a href="mailto:David.Pallenger@sdcounty.ca.gov">David.Pallenger@sdcounty.ca.gov</a> /Chair, District 5 <a href="mailto:bill.horn@sdcounty.ca.gov">bill.horn@sdcounty.ca.gov</a> <a href="mailto:Leon.Brooks@sdcounty.ca.gov">Leon.Brooks@sdcounty.ca.gov</a>, District 4 <a href="mailto:ron-roberts@sdcounty.ca.gov">ron-roberts@sdcounty.ca.gov</a> <a href="mailto:Michael.Beck@sdcounty.ca.gov">Michael.Beck@sdcounty.ca.gov</a>, District 2 <a href="mailto:dianne.jacob@sdcounty.ca.gov">dianne.jacob@sdcounty.ca.gov</a> <a href="mailto:Michael.Seller@sdcounty.ca.gov">Michael.Seller@sdcounty.ca.gov</a>, Vice Chair, District 1 <a href="mailto:greg.cox@sdcounty.ca.gov">greg.cox@sdcounty.ca.gov</a> <a href="mailto:Michael.Edwards@sdcounty.ca.gov">Michael.Edwards@sdcounty.ca.gov</a>, District 3 <a href="mailto:kristin.gaspar@sdcounty.ca.gov">kristin.gaspar@sdcounty.ca.gov</a> <a href="mailto:Bryan.Woods@sdcounty.ca.gov">Bryan.Woods@sdcounty.ca.gov</a>, District 2 <a href="mailto:efhgct@gmail.com">efhgct@gmail.com</a> <a href="mailto:marsenault@realcapitalsolutions.com">marsenault@realcapitalsolutions.com</a></p> <p><u>Re: Escondido Chamber of Citizens (ECOC) Opposition Comment on Harmony Grove Village South (HGVs), Case PDS 2015-GPA-15-002, ER 15-008, and Habitat Loss Permit</u></p> <p>Dear County of San Diego Planning Commissioners:</p> <p>Several months ago Escondido Chamber of Citizens (ECOC) Board of Directors formed a Subcommittee to review work by a highly respected environmental consultant who carefully examined Draft EIR, Recirculated Draft EIR and Appendices prepared for Harmony Grove Village South (HGVs). ECOC Board met yesterday because this Case is on Planning Commission Agenda today, so Board directed me to prepare formal written comments during public hearing, to describe ECOC Board's opposition, based on sound sources provided by Tetra Tech Inc. in Denver Colorado, an international firm with globally recognized expertise in water supply issues. Tetra Tech international consultant (Steve Fisher) identified incomplete analysis is contained in HGVs DEIR pertaining to Water Supply, plus observation that an overly narrow scope of water supply analysis only from Rincon del Diablo Water District is misleading, and reflected a superficial piecemealed analysis. Instead, Tetra Tech International indicated HGVs DEIR's scope fails to examine a bigger picture, that must analyze larger water supply issues from sources beyond Rincon del Diablo Water District, and extended drought made worse by climate change..</p> <p>As an advisory body to San Diego County Board of Supervisors, Commissioners are reminded of immense discretionary land use authority and responsibility because your action today will form a basis upon which County Board of Supervisors will very soon hold public hearing on pending permit applications on Harmony Grove Village South. ECOC Board is aware of countless local amenities that make San Diego County an ideal dream climate and destination for retirement, or luxury living in southern California, among nation's most scenic, prestigious, and lucrative recreational empires that draws millions of people each year seeking ideal employment destinations, and exclusive comforts close to home. These economic assets have driven current real estate market demand to a point that almost seems endless, however experts indicate it is not sustainable, prudent or realistic.</p> <p>This letter serves another purpose; to formalize ECOC Board's fundamental opposition on County's 'expedited process' which reflects piecemealed analysis, by isolating impacts only on the <u>General Plan</u></p>	<p><b>Response to Comments PCO6-1</b> This comprises a late letter. The required submittal date for any communication to be considered at the May 25, 2018 Planning Commission Hearing was close of business May 23, 2018.</p> <p><b>Response to Comments PCO6-2</b> These comments introduce recent review actions undertaken by the Escondido Chamber of Citizens (ECOC), disclosure of their understanding of what makes the San Diego region a high-demand market, and an admonition to the Planning Commissioners regarding their authority and responsibility. These comments do not address adequacy of environmental analyses in the EIR and are not further addressed. These introductory comments also introduce Tetra Tech International of Denver, Colorado and the contention that water supply analysis in the EIR was deficient. This is addressed in more detail below in Response to Comment PCO6-6. Given that the comment is general, a general response is all that is required (Paulek v. California Dept. Water Resources (2014) 231 Cal.App.4th 35, 47-52).</p> <p><b>Response to Comments PCO6-3</b> The issue of bundling is related to more than this single project, as noted in the comment. The comment expresses concern that the County is engaging in an "expedited process" that "reflects piecemealed analysis, by isolating impacts only on the General Plan Amendment (GPA) proposal for Harmony Grove Village South" (HGV South).</p> <p>The County rejects the contention that the projects have been bundled in order to fast-track or expedite them, with a resulting sacrifice of meaningful and thoughtful partnership between the County and community groups for a plan adopted in 2011. First, it is consistent with the policies of the General Plan to consider future amendments. It is also noted that the commenter has an incorrect understanding of planning document function. Planning documents are living documents, and may be amended during their planning life, in accordance with state law and expectations noted in the General Plan itself. The current General Plan was approved seven years ago, and it is reasonable for the County to consider modifications that will support County goals and policies. The General Plan allows for future amendments to the Land Use Map and Regional Categories Map to accommodate future growth. The General Plan (page 1-15) states that it is intended to be a dynamic document and any proposed amendment will be reviewed to ensure that the change is in the public interest and would not be detrimental to public health, safety, and welfare. There are also numerous</p>

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	<p>policies in the General Plan that accommodate future growth that would require General Plan Amendments to the Land Use Map and Regional Categories Map, such as LU-1.2 (establishment of new villages) and LU-1.4 (expansion of existing villages). In any event, the County Board of Supervisors have the ultimate authority to consider whether General Plan amendments (GPAs) are appropriate and consistent with the policies of the General Plan when supported by findings and substantial evidence (No Oil, Inc. v. City of Los Angeles (1987) 196 Cal.App.3d 223, 243). Please also see the Global Response to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis.</p>

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	<p>Finally, in a white paper prepared by J. Laurence Mintier, a further explanation regarding the role of amendments to general plans is provided:<sup>1</sup></p> <p><i>The general plan is a dynamic public policy document with a long-term focus. While it reflects current community values, politics and conditions at the time it was adopted, these values, politics, and conditions change over time and the general plan should evolve with these changes. Tracking these changes requires local government to monitor the implementation of their general plan and to assess how well the general plan is addressing changing challenges.</i></p> <p><i>To this end, State law requires local governments to prepare and submit an annual report to their legislative body, the Office of Planning and Research, and the Department of Housing and Community Development on the status of their general plan and progress in its implementation. (Government Code section 65400(a)(2)(A) The annual report provides the local government an opportunity to identify how effectively its plan is being implemented and what changes are appropriate to keep up with changing times and new opportunities.</i></p> <p><i>OPR's General Plan Guidelines has for many years advocated local governments undertake a thorough review of its general plan every five years and revise the document as necessary.</i></p> <p>As provided for in OPR's Guidelines, and the County's General Plan Implementation Plan (see Program 1.2.1 A, B, C, D) local governments must monitor the implementation of their general plan and to assess how well the general plan is addressing changing community needs. In other words, although the general plan is a document with a long-term focus, it is not intended to be frozen in time. When it was adopted in 2011 it reflected current community values, politics and conditions, however over time these values, politics, and conditions change and the general plan should evolve with these changes.</p> <p>Second, with regard to "fast-tracking, " each project slated for bundling before the Board of Supervisors (including HGV South) has been individually environmentally analyzed, publicly circulated for comment, and has had final project documentation prepared within its own timeline. Similarly, each project has individually moved through Planning Commission with focused discussion and consideration. The public, community planning groups and sponsor groups have had an opportunity to participate in full compliance with California state</p>

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<sup>1</sup> “SAN DIEGO COUNTY GENERAL PLAN: BACKGROUND AND CONTEXT FOR CONSIDERATION OF THE HARMONY GROVE VILLAGE SOUTH PROPOSAL,” prepared by J. Laurence Mintier, FAICP, Mintier & Associates, dated May 22, 2018. Mr. Mintier has worked for over 100 public agencies and his firm has prepared over 50 general plans, including 16 county general plans; 70 housing elements. Mr. Mintier has taught regularly for various University of California Extension programs and has worked for the California Governor's Office of Planning and Research, specializing in planning, land use, and environmental issues. There he directed the preparation of California's 1980 General Plan Guidelines and 1982 revisions.

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	<p>law and County standards. At this point, several projects will be submitted for Board of Supervisors consideration on specific days. During that hearing, the projects will continue to be subject to separate public testimony, and consideration by the decision makers.</p> <p>It is acknowledged that bundling issues have been raised by a number of commenters. The County has reviewed the stated concerns and finds that its actions are both legal and appropriate.</p> <p>Regarding the HGV South site itself, the EIR is clear that the site has some potential for cultural resource sensitivity/value, but no resources of significance have been identified. Independent review of the Project documentation by the Pauma, Rincon, and San Luis Rey Bands was undertaken, as indicated by their correspondence on the Project (see DEIR Responses to Comments O5, O8 and O9, as well as RDEIR Response to Comment RO5. The Bands approved proposed mitigation measures; continued monitoring and appropriate coordination is committed to during construction if the Project is approved. Biological habitats on site are detailed in EIR Subchapter 2.3, <i>Biological Resources</i>. On-site habitats are identified for preservation (over 30 percent of the site), and potential significant impacts have specified required mitigation. Both County biological specialists and resource agency personnel have been on site to review resources and potential corridor concerns. The issue of corridors is addressed in EIR Section 2.3.1 under the heading “Habitat Connectivity and Wildlife Corridors,” and “Del Dios Highlands Preserve – Elfin Forest Recreational Reserve,” as well as in Section 2.3.2.4, where six separate County-required thresholds addressing corridors are addressed. Section 2.3.2.5 again reviews connectivity, as well as regional habitat planning efforts. No impact or less than significant impacts were identified for habitat and connectivity issues. The Project is not expected to result in fragmentation of off-site preserve areas due to Project design features including preservation of 34.8 acres of Project parcel contiguous to preserve area in permanent biological open space. The issue was not overlooked or underestimated in the EIR.</p>

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<p style="text-align: center;"><b>Comment Letter No. PCO6</b></p> <p><a href="#">Amendment (GPA)</a> proposal for Harmony Grove Village South.... which is a predecessor to six (6) other large residential projects also requiring General Plan Amendments which will soon be expedited (or "bundled") so seven (7) large projects will very soon be brought before County of San Diego Board of Supervisors during a series of 3 public hearings before November 2018 General Election. Harmony Grove Village South (HGVS) proposes a mixed use development, including 453 single family and multi-family residential units and 5,000 sf of commercial/civic uses on a 111 acre parcel that contains steep topography, cultural resource value, high value biological habitat with functional wildlife corridor adjacent to two (2) contiguous Open Space Preserve properties. It is expected functionality of the 2 contiguous Open Space Preserves will become fragmented, and degraded by edge effects, causing a compounded negative impact that was overlooked and underestimated in DEIR, plus Recirculated DEIR and Appendices.</p> <p>ECOC Board fundamentally objects to how these seven (7) large projects requiring GPAs were bundled so new high density neighborhoods are fast-tracked or expedited through a speedy approval process that seems an unreasonable sacrifice of meaningful and thoughtful partnership between County and community groups, and extreme waste of a decade of work and investment of over 18 million spent on preparing the SD County General Plan adopted in 2011. Many observers besides ECOC Board share concerns over public controversy generated by these expedited GPA projects, and share opposition expressed from numerous neighbors, individuals, and local environmental organization. ECOC shares concerns expressed by Elfin Forest/Harmony Grove Community Planning Group, who prepared compelling evidence in public record. Additionally, it must not be overlooked there is additional new information and evidence prepared by Shute, Mihaly, Weinburger, a CEQA specialist lawfirm retained to address specific Draft EIR deficiencies from a legal standpoint. Additionally, community planning group (Elfin Forest/Harmony Grove) hired traffic and other consultants to assist in providing expert opinions on Draft EIR. Because comments were prepared by many other experts, ECOC Board did not consider it necessary or productive to duplicate technical comments by prepared by others, but ECOC Board endorses their work, and wishes to incorporate technical studies prepared by other technical experts by in the public record..</p> <p>The GPA public hearing descriptions for GPA hearings prepared by County Planning staff indicate the cumulative total impact from these "bundled" GPA projects will result in construction of over 10,128 new residential units, the majority of which will be large luxury homes, plus extensive new commercial/civic space.. Some early media sources indicate sales prices projected probably \$400,000 at lowest end, and over \$800,000 and higher at upper end of required income levels necessary for buyers. Therefore, ECOC Board expects a dose of healthy skepticism is probably necessary to believe RCS – Harmony Grove Partners LLG's consultants claims that HGVS will provides so many 'community benefits' such as <b>shouldering San Diego's fair share of affordable housing to meet RENA requirements under HUD Housing Element</b>, since claims are largely unsupported by evidence in the public record.</p> <p>There are a number of other items that concern ECOC Board, including: environmental, open space, traffic, fire, evacuation, substandard roads, extreme density increases ...but the most important for Planning Commission to focus on today is WATER supply, which ECOC considers the most overlooked, or underestimated. <a href="#">The Draft EIR dated May, 2018 does not evaluate regional (downstream of Lake Mead) water supply. This project will be felt much farther away than Rincon del Diablo Municipal Water District.</a></p> <p style="text-align: right;">PCO6-3 PCO6-4 PCO6-5 PCO6-6</p>	<p><b>Response to Comments PCO6-4</b></p> <p>The ECOC's comments endorsing comments provided by the Elfin Forest Harmony Grove Town Council on the Project, including those prepared or provided by Shute, Mihaly and Weinberger on their behalf, are noted. Each of these comments has been addressed. Please refer to DEIR Responses to Comments O3a, O3b, O3c and O6, as well as Revised DEIR Responses to Comments RO3 and RO6.</p> <p><b>Response to Comments PCO6-5</b></p> <p>The contention that LLG addressed RENA housing requirements relative to HGV South is not understood. LLG completed Project traffic analyses, and are otherwise not involved in Project design or technical review. In any event, there has been no representation by the Project proponent that the Project meets RENA requirements. On the other hand, there are substantial benefits to be gained from the Project; including provision of additional housing types not currently available within Harmony Grove Valley or HGV, provision of a bridge over Escondido Creek that would benefit all users of Country Club Drive south of the creek, widening of Country Club Drive south of Harmony Grove Road, also benefitting all users of those segments, new public park provision, and set-aside of approximately 35 acres of open space into preserve in an area currently suffering from previously unrestricted public access.</p> <p><b>Response to Comments PCO6-6</b></p> <p>A number of items of "concern" are generally identified in this comment, but the lack of specificity makes it impossible to provide specific responses. Please see EIR Chapter 1.0, <i>Project Description, Location and Environmental Setting</i> for overall definition of Project characteristics, Subchapter 2.1, <i>Aesthetics</i> for information of the visual effect of Project open space areas, Subchapter 2.3 specific to biological open space, and Subchapter 2.2, <i>Transportation/Traffic</i> regarding traffic. The Project does not propose substandard roads. Specific to fire and evacuation, please see FEIR Sections 3.1.3, <i>Hazards and Hazardous Materials</i>, and 3.1.8, <i>Public Services</i>, as well as the Global Responses to Fire Hazards Impact Analysis, and Adequacy of Emergency Evacuation and Access.</p>

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	<p>The remainder of this comment addresses water issues in the Southwest and the assertion that approval of the Project would result in more vulnerability to dry periods for the region. The County has determined that there are sufficient, available, and reliable water supplies to meet the water demand of the Project in addition to the planned and other future land uses in Rincon MWD service area during a normal year through 2040. In addition, regional and local water supply actions are in place to respond to drought conditions in both single and multiple dry years with some years potentially requiring management actions (e.g., conservation), to maintain supply (SDCWA UWMP 2016). Therefore, impacts associated with the Project's water supply demand would be less than significant. Section 3.1.11.2 of the DEIR analyzed drought conditions with respect to water supply:</p> <p><i>According to the Rincon MWD 2015 UWMP (Rincon MWD 2016), coordinated regional planning for future drought situations has resulted in both Metropolitan Water District and SDCWA developing drought management plans to fairly and adequately deliver water to their member agencies. SDCWA has invested in carryover storage supplies to assist in achieving reliability in dry years as discussed in its 2015 UWMP. SDCWA's carryover supplies include regional surface water storage and groundwater storage in the California Central Valley. This has been supported by the 2014 Rincon MWD Drought Ordinance, with voluntary, and potential mandatory, use rate cuts.</i></p> <p>SDCWA's 2015-UWMP included an assessment of its water supply reliability. This assessment compared the total projected water supply and demands over the next 20 years in five-year increments under normal, single-dry year, and multiple-dry water years. Only verifiable supplies with adequate documentation as having achieved a level of certainty in planning and implementation were included in the reliability assessment.</p> <p>The verifiable water supply projects included in SDCWA's reliability assessment are shown in Tables 4-1 through 4-3 of the SDCWA 2015 UWMP. These water supply projects include the following; SDCWA-IID Transfer Supplies as shown on Table 4-1; conserved supplies from the canal lining projects as shown on</p>

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	<p>Table 4-2; and the recently completed Carlsbad Seawater Desalination project as shown on Table 4-3. (These same projects were also included in the 2010-UWMP.) For purposes of the SDCWA assessment, the projected supplies from the MWD are considered supplemental and are calculated as the increment of supply necessary to meet demands after taking into account other sources from the member agency and SDCWA. The water supplies from the IID Transfer, canal lining projects, and Carlsbad Desalination Plan were considered to be drought resilient supplies. In addition, SDCWA invested in a “carryover storage supply” program that could be utilized in dry years to improve reliability. The carryover storage program includes both surface water storage in San Vicente Reservoir and out-of-region groundwater storage in California’ Central Valley (See Section 11.2.4 of SDCWA’s 2015 UWMP).</p> <p>Table 89-1 of SDCWA’s 2015-UWMP shows the normal year assessment, summarizing the total water demands within SDCWA’s service area through the year 2040, along with the supplies necessary to meet demands under normal conditions. No shortages are anticipated within SDCWA’s service area in a normal year through 2040. Table 89-2 shows the single dry-year assessment, utilizing a number of conservative assumptions (as described further below). No shortages are anticipated within SDCWA’s service area in a single dry year until 2035 (23,907 afy), and during a multiple dry year beginning in 2028 (29,314 afy). (See Tables 9-3, 9-4, 9-5, 9-6 and 9-7, SDCWA’s 2015-UWMP.) However, these shortages would be eliminated should the MWD’s supplies approach the supply levels projected in MWD’s 2015-UWMP single-dry-year and multiple-dry-year supply capabilities (SDCWA’s 2015-UWMP). If there are shortages, SDCWA will address these shortages by:</p> <ul style="list-style-type: none"> <li>a) implementing extraordinary conservation measures, achieved through voluntary and mandatory water-use restrictions that were used during the 2012–2016 drought period (see Section 11.2.3, SDCWA’s 2015-UWMP);</li> <li>b) implementing its carryover storage program, which includes (i) in-region surface storage of approximately 100,000 acre-feet at San Vicente Reservoir, secured as part of the San Vicente Dam Raise project completed in 2014, with the carryover pool of 100,000 acre feet full by</li> </ul>



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	<p>June 2016, and (ii) out-of-region permanent groundwater storage allocation of a total of 70,000 acre-feet in water banks located in Kern County;</p> <p>c) if necessary, securing dry-year water transfers, which the SDCWA acquired and utilized during the 2007–2011 shortage management period as described (see Section 11.2.4 of the SDCWA’s 2015-UWMP).</p> <p>Furthermore, the SDCWA applied very conservative assumptions regarding the availability of dry year supplies from MWD. For instance, the SDCWA has assumed that: (i) MWD is limited to 1.4 million acre-feet of supplies due to dry conditions and increased reductions in deliveries from the State Water Project (no Delta improvements) and/or a reduction in Colorado River deliveries; and (ii) the SDCWA receives its preferential right based on MWD’s current method of calculating such rights.</p> <p>These assumptions are highly conservative because:</p> <p>a) MWD’s 2015 UWMP’s single dry-year and multiple dry-year supply capability projection do not report a shortage (Tables 2-4, 2-5, MWD 2016, incorporated herein by this reference and available at: <a href="http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_management_Plan.pdf">http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_management_Plan.pdf</a>);</p> <p>b) California is in the process of modernizing the Delta’s water conveyance system in compliance with the federal ESA through a Section 7 consultation process and the state ESA via a Fish and Game Code Section 2081(b) incidental take permit as part of the California WaterFix proposed project, which is currently under environmental review (SDCWA’s 2015- UWMP); and</p> <p>c) the SDCWA is in litigation with MWD challenging how MWD calculates member agency preferential rights and this litigation could result in significantly increased water supplies to the SDCWA (see Section 6.2, SDCWA’s 2015-UWMP).</p> <p>For both single and multiple dry year events, Rincon MWD would actively promote a “voluntary 10 percent reduction in use” message, and expects this will</p>

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	<p>counteract the tendency for demands to be higher than normal during dry conditions such that its dry year demands will be the same as its projected normal year demands. Accordingly, from a regional planning perspective, no shortage of supplies would be anticipated in Rincon MWD's service area during either single or multiple dry year events. While multiple dry year scenario shortages are not likely due to the existence of carryover storage supplies, Rincon MWD has plans in place to deal with such an occurrence, including the aforementioned Drought Response Plan.</p> <p>Please also note that the statement that the Project would displace agriculture is incorrect. There is no agriculture on site and the less than significant effects to off-site resources are addressed in Subchapter 3.2, <i>Effects Found Not Significant During Initial Study</i>.</p>

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<p style="text-align: center;">Comment Letter No. PCO6</p> <p><u>Neither Metropolitan Water District of Southern California nor any of its member agencies have commented on the impact to all southern California residents from the additional 201 acre-feet (AF) per year needed by Harmony Grove Village South. However, County of San Diego should not ignore its stewardship role where no other entity is. Bottom line, southern California's water supply is already over-allocated, meaning, all new demand causes water stress for all – people and environment.</u></p> <p>The other items may have an argument one way or another. However, WATER, a necessity to sustain life, as well help the other items, has a shortage that is black and white ...and getting worse!!</p> <p>From a variety of sources provided by Tetra Tech <u>Inc. Engineering</u> in Denver, Colorado, an international firm that deals with water issues, are some examples:</p> <p>The Colorado River is bone dry for 100 miles up from its end in the Gulf of California.</p> <p>Lake Mead and Lake Powell are down about 60%...130 feet from normal.</p> <p>Water due California through the California Aqueduct is <u>significantly</u> over-allocated (8 states- Wyoming, Colorado, New Mexico, Utah, Arizona, Nevada, California, as well as Mexico, Depend on Colorado River Water.)</p> <p>Other parties i.e. Nevada, 5 tribes have obtained rights to the existing water banking reserves of California. Additionally, other users practice unauthorized groundwater withdrawals from aquifer sources further diminish shrinking water table. In other words, we show more water on paper than is real!!</p> <p>U.S. Bureau of Reclamation declares the total system is in a "structural deficit" of 1.2 million acre-feet a year. Scripps Institute of Oceanography studies document "current scheduled depletions are simply not sustainable."</p> <p>So called "water saving" practices have proven to, yes, have the apparent benefit of saving water. But according to studies at Colorado State University's Colorado Water Institute, it can make the water problem worse. How? There are several reasons, but one is it is directed to brand new subdivisions, leaving the enlarged system more vulnerable to dry periods, like <u>decades-long droughts</u> <del>the several-year</del> <u>drought</u>, exacerbated <u>now</u> <del>by the</del> climate change. <u>Harmony Grove's displacement of agricultural and open space land use with high density development results in more vulnerability for the region.</u></p> <p>So Planning Commissioners - please don't <u>let thousands more new residents join</u> <del>put</del> the 3,300,000 <u>residents</u> in San Diego County <del>people already on a drought journey on the in the county in a</del> <u>TITANIC boat ride with those 60,000 possibly new resident relying on water and a safe place to live.</u></p> <p>Thank you for thoughtful consideration,</p> <p>Patricia Borchmann, President                      Jerry Fisher, Board Member Escondido Chamber of Citizens</p> <p>Copy: San Diego Union Tribune, Times Advocate – Escondido, The Coast News – Inland north SD County Elfin Forest/Harmony Grove Community Planning Group, San Dieguito Planning Group Steve Fisher, Tetra Tech International, Denver, CO</p> <p style="text-align: center;">PCO6-6</p> <p style="text-align: center;">PCO6-7</p>	

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<p style="text-align: center;"><b>Comment Letter No. PCO6</b></p> <p style="text-align: center;">Mayor Sam Abed, and Escondido City Council</p> <p>REFERENCES</p> <p>Dexter Wilson Engineering Co. 2018. Appendix P – Potable Water Study. In County of San Diego, 2018, Draft Final Environmental Impact Report, May 2018. May. Accessed online at: <a href="https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/hgvs/HGVSwweb/TechStudies/PDS2015-GPA-15-002-EIR-AppP-Potable-Water-Study.pdf">https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/hgvs/HGVSwweb/TechStudies/PDS2015-GPA-15-002-EIR-AppP-Potable-Water-Study.pdf</a></p> <p>Gelt, Joe. 1997. Sharing Colorado River Water: History, Public Policy and the Colorado River Compact. Water Resources Research Center. University of Arizona. August. 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Accessed online May 23, 2018: <a href="https://www.usbr.gov/lc/region/s1000/lawofrvr.html">https://www.usbr.gov/lc/region/s1000/lawofrvr.html</a></p>	<p><b>Response to Comments PCO6-7</b></p> <p>Comment 7 identifies letter "references," some of which are attached to the letter.</p> <p>The Dexter Wilson Potable Water Study comprises Appendix P to the EIR. As such, its content is reflected in the EIR, and no modifications are required.</p> <p>The "Sharing Colorado River History" article is a 1997 article on the history (including historical allocations), public policy and the Colorado River Compact signed by representatives of seven states in 1922. It provides historical data related to water agreements as of just over 20 years ago. "Current" (1997) use, allocation and concerns are described, with the article ending on positive note that the compact will continue to evolve "to confront emerging issues." The Project was evaluated consistent with California state law and County standards regarding disclosure of regional water availability as addressed by primary servers to the Project (the Metropolitan Water District of Southern California, San Diego County Water Authority and Rincon del Diablo Municipal Water District). No revisions to the EIR are warranted.</p> <p>PCO6-7 The "Economic and Environmental Impacts of Climate Change in Nevada" article addresses depleted groundwater, changes in runoff patterns, reduced river flows, etc. as related to climate change. The effect of climate change on tourism and health is also noted. The article concludes with recommendations for national policy shifts, as well as national and regional cap-and-trade programs. The recommended programs appear consistent with those underway in California. Regardless, the Project was evaluated consistent with California state law and County standards regarding disclosure of regional water availability as addressed by primary servers to the Project (the Metropolitan Water District of Southern California, San Diego County Water Authority and Rincon del Diablo Municipal Water District). No revisions to the EIR are warranted.</p> <p>"Where the River Runs Dry" is a New Yorker magazine article describing a visit to the Colorado River and Grand Valley, as well as dams and facilities associated with the river; addressing surface and ground water relative to Lake Mead, dams and the Colorado River/environs. The Project was evaluated consistent with California state law and County standards regarding disclosure of regional water availability as addressed by primary servers to the Project (the Metropolitan Water District of Southern California, San Diego County Water Authority and Rincon del Diablo Municipal Water District). No revisions to the EIR are warranted.</p>

COMMENTS	RESPONSES
	<p>The “Law of the River” document lists laws and agreements relating to the Colorado River with specific references to actions in 1922 through 1974. There is no analysis included. The Project was evaluated consistent with California state law and County standards regarding disclosure of regional water availability as addressed by primary servers to the Project (the Metropolitan Water District of Southern California, San Diego County Water Authority and Rincon del Diablo Municipal Water District). No revisions to the EIR are warranted.</p> <p>The additional articles cited in references were neither attached nor specifically referred to in the letter. No further response is provided.</p>