

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter I17</p> <p>Ms. Ashley Smith Land Use & Environmental Planner Planning & Development Services 5510 Overland Avenue, Suite 310 San Diego, CA 92123</p> <p>E-Mail: Ashley.Smith2@sdcounty.ca.gov</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>To Whom It May Concern,</p> <p>Thank you for the opportunity to provide comments on the Harmony Grove Village South proposal being put forth by the Kovach Group and RCS Partners. I've lived in the community of Harmony Grove since 2001 in a home less than a half-mile from the Harmony Grove Spiritualist Association that was destroyed in the 2014 Cocos Fire. I'm deeply troubled that the County's draft Environmental Impact Report negligently list the risk of wildfire, as detailed in Hazards and Hazardous Materials (Section 3.1.4), as an effect found not significant as part of the EIR process.</p> <p>The hazard of wildfire should be considered a very significant effect of the proposed project since the Fire Protection Plan (FPP) prepared by Dudek (2016) requires being granted an exception to the 2017 San Diego County Consolidated Fire Code in an area deemed "Very High Fire Hazard Severity Zone".</p> <p>HGVS would require a waiver of the 800 foot maximum dead end road requirement (503.1.3). The only mitigation acceptable for exceeding this requirement is providing secondary access (503.1.2). The Fire Protection Plan (FPP) misleadingly states that, "The dead-end road that leads to the most distant structure on HGVS measures approximately 0.8 miles to the intersection of Harmony Grove and Country Club Drive, the first opportunity to travel in at least two separate directions." This disregards all of the existing residents that live as far as 1.05 miles (or 7 times what the fire code states is safe with the rezoning being requested by the developer) from that same intersection.</p> <p>The FPP fails to demonstrate appropriate mitigation to avoid putting existing residents in danger of burning to death in their cars, trapped behind a line of cars from HGV and HGVS, as well as possibly the existing residents of Elfin Forest and Eden Valley depending on the direction of a fast moving wildfire. There should be zero tolerance for granting exceptions and exemptions to the California Fire Code in a Very High Risk Fire Area, but particularly not when the Wildfire Risk Assessment (Rhode & Associates, 2016) included in the DEIR so inadequately addresses how the lack of secondary egress is being mitigated. As states by Rhodes & Associates:</p> <div style="position: relative; height: 300px;"> <div style="position: absolute; right: 0; top: 0; bottom: 0; text-align: center;"> <div style="position: absolute; top: 0; bottom: 0; width: 1px; border-left: 1px solid black;"></div> <div style="position: absolute; top: 0; width: 10px; height: 10px; border-bottom: 1px solid black;"></div> <div style="position: absolute; top: 40%; width: 10px; height: 10px; border-bottom: 1px solid black;"></div> <div style="position: absolute; top: 80%; width: 10px; height: 10px; border-bottom: 1px solid black;"></div> </div> <div style="position: absolute; right: 0; top: 0; text-align: right;">I17-1</div> <div style="position: absolute; right: 0; top: 40%; text-align: right;">I17-2</div> <div style="position: absolute; right: 0; top: 80%; text-align: right;">I17-3</div> </div>	<p>Response to Comment I17-1</p> <p>Introductory comments noted. The Harmony Grove Village South (HGV South) Project is not identified as resulting in a clear and significant risk to the lives and safety of existing residents. The Project has undergone thorough review on a project-specific basis. Based on assessment of the relative design features, as well as the required mitigation measures, no significant health and safety risks were identified. Please see responses below to specific comments.</p> <p>It is acknowledged that the Project is within a Very High Fire Hazard Severity Zone (VHFHSZ) and that fact is referenced in the Project's Fire Protection Plan (FPP) (DUDEK 2016). Based on its location in a VHFHSZ, the Project is required to provide for a level of planning, ignition-resistant construction, access, water availability, fuel modification, and construction materials and methods that have been developed specifically to allow safe development within these areas. The Project meets and exceeds these requirements.</p> <p>The Project requested a modification to the dead-end road length requirement and provided alternative fire safety features that meet the intent and purpose of the 2017 San Diego County Consolidated Fire Code (Code). This is consistent with the Code, and does not constitute an "exception" to the Code. Please refer to Global Responses to Comment for Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I17-2</p> <p>The comment seems to indicate misreading of the cited text. It is correct that "the most distant structure on HGVS [sic, HGV South in the EIR] measures approximately 0.8 mile..." The dead-end road lengths analysis applies only to the Project. Off-site existing uses are not addressed under the code. Please refer to Global Responses to Comment for Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I17-3</p> <p>Please refer to Response to Comment I17-1 and to Global Responses to Comment for Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p>

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<p style="text-align: right;">Comment Letter I17</p> <p>Concern had been expressed that only one route was proposed for access/egress to the proposed development site rather than the code required construction of two, and that a variance would be requested/required for the project to move forward. 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 potential routes of egress during evacuation, two with strong viability. All participants expressed comfort that the proposed variance for the 800 foot single access road was acceptable.</p> <p style="text-align: right;">117-3</p> <p>This is an unacceptable lack of explanation to address the concerns of existing residents as to why the Fire Code should be ignored. The EIR needs to evaluate and disclose impacts to the entire region, not just the 1400 feet of improved road contemplated in the DEIR. The existing road infrastructure is not appropriate for evacuation with an increase in population from HGVS. The Project is only proposing to improve 1400 feet of Country Club Drive to the intersection with Harmony Grove Road; yet the project impact will result in unmitigated traffic and safety impacts on many more roads including Country Club Drive north of Harmony Grove Road, Kuana Loa, and Elfin Forest Road including all the way to San Elijo where evacuating traffic was stuck for almost 2 hours in the last emergency evacuation. The project risks compromising the evacuation of the entire communities of Harmony Grove, Eden Valley, Elfin Forest, Cielo and even San Elijo Hills by clogging evacuation routes. The DEIR needs to evaluate and disclose impacts on the entire regional road infrastructure.</p> <p style="text-align: right;">117-4</p> <p>The developer and the County must know that the FPP for the proposed development does not adequately mitigate the wildfire risk with the minor road improvements to a short span of road, otherwise they would not put forth a Shelter-in-Place "philosophy," (but not official status as stated in the DEIR, as this would have stricter requirements).</p> <p style="text-align: right;">117-5</p> <p>It's easy to propose a shelter in place concept when you're not the one whose loved ones are being put in danger.</p> <p>Signed,</p> <p>Erin Dummer 2966 Cordrey Drive Escondido CA 92029</p>	<p>Response to Comment I17-4</p> <p>These comments are noted regarding the Cocos Fire and preference for zero tolerance on granting exceptions and exemptions. The Project is consistent with the Fire Code. Please refer to Global Responses to Comment for Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I17-5</p> <p>The County respectfully disagrees with the stated comments. The Project is not a shelter-in-place development. Please refer to Global Response to Comment for Adequacy of Emergency Evacuation and Access.</p>