

COMMENTS	RESPONSES
<p style="text-align: right;"><b>Comment Letter I19</b></p> <p><b>From:</b> <a href="#">Neubauer, Julie</a>  <b>To:</b> <a href="#">Smith, Ashley</a>; <a href="#">Aghassi, Sarah</a>; <a href="#">Horn, Bill</a>; <a href="#">Ron-ROberts, Jacob</a>; <a href="#">Dianne, Cox</a>; <a href="#">Greg, Gaspar</a>; <a href="#">Kristin, Elfin Forest Harmony Grove Town Council</a>; <a href="#">marsenault@realcapitalsolutions.com</a>  <b>Subject:</b> 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.)  <b>Date:</b> Tuesday, June 20, 2017 9:41:09 PM</p> <hr/> <p>Ms. Ashley Smith  Land Use &amp; Environmental Planner  Planning &amp; Development Services  5510 Overland Avenue, Suite 310  San Diego, CA 92123</p> <p>E-Mail: <a href="mailto:Ashley.Smith2@sdcounty.ca.gov">Ashley.Smith2@sdcounty.ca.gov</a></p> <p>Dear Ms. Smith:</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 am a resident of the united rural communities of Eden Valley, Harmony Grove and Elfin Forest in unincorporated San Diego County, one of the last contiguous stretch of rural land and open space in the County within 15 minutes of the coast and with thousands of acres of open space. We are one of the oldest rural communities in the County, going back to the late 1800s with the establishment of the Harmony Grove Spiritualist Association where, until the most recent fires, the oldest church in San Diego stood. I've lived in Harmony Grove for 6 years and have hiked/mountainbiked/ridden horseback/etc here for over 25years. My wife and I moved here because of the rural nature and spread-out design of housing and open space in the area.</p> <p>FIRE EVACUATION ISSUES: I'm very concerned about this project because it risks my safety and destroys the community character of this wonderful little area I live in. The fire evacuation issue is of utmost concern and the fact the Fire Protection Plan waives the crucial secondary access requirement is a very big deal for us. According to the DEIR, the project will help fund a shortfall that the County created when it approved the first development, HGV. We lived through Coco's Fire and evacuation was very compromised even without any new developments. We had many horse trailers clogging the roads, fire trucks, blocked traffic on both ends of our valley and it took a long time to evacuate. Harmony Grove Village had not been built yet. With HGV fully built out AND your misleadingly named HGV South, there will be another 1200 dwellings in the area which could bring 2400 more vehicles (all trying to get out). But what will NOT change are the roads in and out of our community and the proposed project. A two lane road is the only way in and out of this valley. And the County, in its infinite wisdom, has granted a variance to the secondary exit requirement. Even the DEIR's own fire studies show that Country Club is the ONLY safe way out during a fire. 1400 feet of road they propose improving prior to crossing the Escondido Creek is worthless when it comes to evacuation because what good is a wide road if it is only wider for 1400 feet. It bottlenecks right back to 2 lanes for the remainder of the several miles that it takes to get out of the fire trap we live in. Please re-analyze the fire risk, and require, at the very least, a secondary exit like all communities in Very High Fire Severity Zones. And please don't tell me that their un-official Shelter in Place "philosophy" will lessen traffic or reduce the fire risk. It will protect the existing residents, but we will be even more at risk. And</p> <div style="position: absolute; right: 0; top: 440px;">I19-1</div> <div style="position: absolute; right: 0; top: 640px;">I19-2</div> <div style="position: absolute; right: 0; top: 790px;">I19-3</div>	<p><b>Response to Comment I19-1</b>  The County acknowledges these introductory comments; however, they do not raise an issue concerning the environmental analysis or adequacy of the EIR. Please see the responses below to specific comments.</p> <p><b>Response to Comment I19-2</b>  Although community character is mentioned, this comment focuses on fire evacuation. For that reason, the remainder of this response focuses on fire evacuation and secondary access. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p><b>Response to Comment I19-3</b>  Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p>

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We hope this story does not get told in Harmony Grove where we have a serious fire once a decade that have cost property damage and even fatalities.</p> <p>WATER QUALITY: There is a proposal in this development to 'potentially' build a plane for HGVs. This seems fairly transparent as they mention many times that they would like to tie into the HGV project plant which, when approved years ago, was agreed that no future developments could tie into it. During the last rains the HGV plant failed so tragically that there was raw-sewage and toilet paper flowing in great volume down Harmony Grove Road. The current plant in the City of Escondido was leaking so much raw sewage for decades that it made San Elijo Lagoon in Encinitas the #2 polluter of CA coastline for MANY years. #2! That means our ocean water quality was worse than the harbor in LA or Long Beach because of a failing plant in Escondido! Now another plant is proposed for a ~450 home development and it's effluents treated or not would enter the creek near the already mis-functioning and poorly managed HGV plant? Not acceptable in any way.</p> <p>COMMUNITY CHARACTER: I think it is important to note that placing 453 multi-family units and condos in a rural community, abutting 1000s of acres of recreational and conservation open space is completely out of character. No matter what farm-related names you want to give these condos (granary?) placing a city block's worth of density into an historic, unique rural community that is the last of its kind anywhere in Southern California goes against everything the General Plan of San Diego, our community plan and really, common decency calls for. The traffic alone generated by this project will destroy our way of life since we all live on a narrow two lane country road. 4500 average daily trips takes it from Level A to Level F according to the DEIR. This and the many other impacts will forever change the nature of this community.</p> <p>Please do not approve this project. Our lives depend on it and our way of life too.</p> <p>Julie Neubauer Torrey Pines High School World History</p> <p>Torrey Pines High School <a href="mailto:julie.neubauer@scdusd.net">julie.neubauer@scdusd.net</a></p>	<p><b>Response to Comment I19-4</b></p> <p>The comment requests review of a recent fire and evacuation in Portugal. A comparison between Portugal and Harmony Grove Village South is not valid as the factors and conditions related to each location are different or unknown. For example, the wildfire in Portugal had different roadway conditions, evacuation process, emergency management oversight, wildland fuels, number of persons and vehicles, distance to safe areas, and options for temporarily refueling on-site. The Portugal wildfire was burning in eucalyptus and pine forest, which would produce a much more aggressive fire than the coastal sage scrub and grasslands around the Project site and larger Harmony Grove Valley. Many other fire protection features built into the Project and measures routinely enacted by emergency personnel in San Diego County are not available and were not employed in the Portugal fire. Therefore, neither the Fire Protection Plan (FPP) or EIR was revised to include this information.</p> <p><b>Response to Comment I19-5</b></p> <p>The Project's water reclamation facility would be state-of-the-art, as described in Chapter 1.0, <i>Project Description</i>, of the EIR. The water reclamation facility is subject to Waste Discharge Requirement (WDR) permits by the Regional Water Quality Control Board (RWQCB) similar to the WDR requirements for the existing Harmony Grove Village water reclamation plant. Water reclamation facilities are subject to monitoring and reporting program requirements, which are intended to ensure the reliability of the operation and maintenance of these facilities and to protect the water quality of receiving waters. It is noted that certain significant storm events may occasionally exceed the capacity of water treatment facilities resulting in occasional overflows of effluent into receiving waters. These occasions are extremely rare, particularly in San Diego County. Project-related water quality was evaluated in Section 3.1.4, <i>Hydrology/Water Quality</i>, and all issues were identified as less than significant based on technical data provided in EIR technical appendices M-1, the <i>CEQA Preliminary Hydrology/Drainage Study</i>, M-4, the <i>Hydraulic (Floodplain) Analyses for HGV South</i>, and N, the <i>Priority Development Project Storm Water Quality Management Plan</i>.</p> <p><b>Response to Comment I19-6</b></p> <p>It is acknowledged that the Project exceeds the number of lots (approximately 220) allowed for the site under the 2011 General Plan land use designations. Even with this increased density, the Project is considered consistent with community character. Please see the Global Response to Project Consistency</p>

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	<p>with General Plan Policy LU-1.4. Specific to traffic, and the effect of Project traffic on existing levels of service (LOS), the comment regarding the Project reducing levels of service along roadways from LOS A to LOS F is incorrect. Please see EIR Tables 2.2-6 and 2.2-7.</p> <p>The Country Club Drive and Harmony Grove Road intersection would be improved as part of Project design (see the Project Vesting Tentative Map) to operate at LOS B. Even when all non-Project cumulative traffic is added in, identified impacts remain few. It is acknowledged that one <u>existing</u> LOS F segment (Harmony Grove Road between Kauana Loa Drive and Enterprise Street) would remain at LOS F. The County has a Traffic Impact Fee (TIF) Program to address cumulative impacts. As described in EIR Section 2.2.7:</p> <p><i>...the segment is bound by two intersections, Harmony Grove Road/Kauana Loa Drive in the County and Harmony Grove Road/Enterprise Street in Escondido. The County intersection is located within the portion of Harmony Grove Road that is classified as a TIF-eligible facility. Therefore, the Project's TIF payment mitigates the shared intersection, which would improve operations on adjacent legs, both TIF and Non-TIF eligible. As such, cumulative improvements from TR-10 would apply to this impact, and implementation of mitigation measure TR-10 would be expected to reduce this cumulative impact to less than significant.</i></p> <p>Of all the other analyzed County intersections and roadways, the only remaining LOS F impact would be a related impact at the intersection of Harmony Grove Road and Kauana Loa Drive (where Existing plus Project plus Cumulative traffic would reduce LOS from D to F). As described above, the intersection would be improved to acceptable LOS via the TIF payment. Elfin Forest Lane was not identified as carrying Project traffic as it is almost 3 miles westerly of the Project (as the bird flies) and, per County guidelines, would not carry the amount of project trips warranting LOS analysis.</p>

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	<p><b>Response to Comment I19-7</b></p> <p>The County acknowledges this comment and its opposition to the Project. This comment does not raise specific issues regarding the substantive environmental analysis conducted within the EIR. The comment will be included as part of the administrative record and made available to the decision makers prior to a final decision on the Proposed Project.</p>