

COMMENTS	RESPONSES
<p style="text-align: right;"><b>Comment Letter I26</b></p> <p>June 19, 2017</p> <p>Ms. Ashley Smith Planning &amp; Development Services County of San Diego 5510 Overland Ave. Suite 310 San Diego, CA 92123</p> <p><b>RE: HARMONY GROVE VILLAGE SOUTH</b></p> <p>Log No. PDS2015-ER-15-08-006 SCH No. 2015081071 Project Numbers: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5560, PDS2015-MUP-15-008, PDSXXXX-HLP-XXX.</p> <p>Dear Ms. Smith,</p> <p>Thank you for the opportunity to comment on the Harmony Grove Village South proposal. I am writing in opposition to the County of San Diego General Plan amendment being requested by the Kovach Group and the RCS Harmony Partners, LLC, as I believe the proposal's greatly increased density would intensify the dangers for residents living in and evacuating from the high risk fire areas of Elfin Forest, Harmony Grove, and Eden Valley. I am a resident of Elfin Forest.</p> <p>I worked in Public Safety for over thirty years in the San Diego Police Department, including two years as the Commanding Officer of the Traffic and Special Events Division and nine years as Assistant Chief. We routinely developed egress plans for major events and incidents, and I understand the level of traffic control needed to move large volumes of traffic through areas quickly. To evacuate an area with limited exits in times of crisis when people are stressed and frightened, there have to be sufficient safety personnel stationed at key posts early enough in the incident to ensure that traffic keeps moving and to eliminate driver indecision.</p>	<p><b>Response to Comment I26-1</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 I26-2</b> The comments regarding public safety service and knowledge of evacuations are noted and are not in variance with the EIR's analysis.</p>

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<p style="text-align: center;"><b>Comment Letter I26</b></p> <p>The Elfin Forest/Harmony Grove Town Council, of which I am a member, received numerous complaints from our residents regarding the difficulties they encountered during the Coco's Fire evacuation in 2014, along with their fears of potentially being trapped in the path of fire in the future. I subsequently met with the Captain and Lieutenant of the San Marcos Sheriff's Station regarding the concerns. They were open to suggestions and agreed that any such future evacuation needed to be much better, and even agreed to come out to the community and address their concerns, which they did. I know from my own law enforcement experience, however, that the San Marcos Sheriff's Station does not have sufficient staffing in a quick moving fire emergency to do incident management, make evacuation notifications and welfare checks, and staff sufficient traffic posts quickly enough to keep the people being evacuated moving until they are far enough out of the area to allow the continuing movement of the rest of the evacuees behind them. This was the primary problem with the westbound evacuation through the San Elijo Hills community during the Coco's Fire.</p> <p>In the 2014 Cocos Fire, residents were required to evacuate from the Elfin Forest, Harmony Grove and Eden Valley areas. Elfin Forest Road is the only exit to the west of these communities, and Harmony Grove Road and Country Club Drive were the only exits to the east. The Wildland Urban Interface plan continues to designate that Elfin Forest residents are to evacuate to the west, through the San Marcos community of San Elijo Hills, on San Elijo Road. During the Coco's Fire, however, <b>this plan failed</b>. The population of San Elijo Hills, which has now grown to approximately 43,000, was also forced to evacuate westbound on San Elijo Road, as they had no other exit. Elfin Forest residents, many with large horse trailers, were unable to turn west onto San Elijo Road due to the gridlock from San Elijo Hills, causing traffic to backup on Elfin Forest Road into Elfin Forest and stop. Even during non crisis times, Elfin Forest and Harmony Groves' only egress to the west routinely and severely backs up twice a day when school is in session, due to the San Elijo Middle School being located directly on Elfin Forest Road south of San Elijo Road, with the student drop off/ pickup and pedestrian traffic blocking northbound traffic, resulting in usual delays of five to ten signal cycles to drive the two blocks past the school. There is no alternative route. In a crisis situation with parents attempting to retrieve their children from school, it is anticipated that this blockage would be amplified.</p> <p>Harmony Grove Road, Country Club Drive, and Harmony Grove Village Parkway are the only current exits to the east and northeast for the Elfin Forest, Harmony Grove, and Eden Valley communities. Other than an approximately two block stretch of Harmony Grove Road between Country Club Drive and Wilgen Road, each is only a two lane road with one lane in each direction. When westbound Elfin Forest Road to San Elijo Road locked down during the Coco's fire, residents being evacuated were</p> <div style="position: absolute; right: 50px; top: 290px;">I26-3</div> <div style="position: absolute; right: 50px; top: 580px;">I26-4</div>	<p><b>Response to Comment I26-3</b> The comments regarding San Marcos Sheriff's Station staffing and evacuations from the San Elijo Hills community during the Cocos fire are noted and are not in variance with the EIR's analysis.</p> <p><b>Response to Comment I26-4</b> The comments are noted, and are not in variance with the EIR's analysis.</p>

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<p style="text-align: right;"><b>Comment Letter I26</b></p> <p>forced to turn and head east into heavily treed areas of Harmony Grove Road which later burned. Harmony Grove Road also became gridlocked. Harmony Grove and Eden Valley residents have given vivid descriptions of watching homes catch fire from embers and burn in front of them as they were unable to get out on blocked roads, without any Fire or Law Enforcement personnel or equipment in sight. The limited number of available personnel from all responding agencies were deployed elsewhere. It is always most difficult to get sufficient numbers of safety personnel redirected and in place during the first critical hour or so of a major incident, but that is when the highest danger exists of lives being lost. It is especially true in the case of fast moving fires, such as the Coco's Fire that burned through Harmony Grove in 2014 and the Harmony Grove Fire in 1996.</p> <p style="text-align: right;">I26-4</p> <p>Significantly increasing the residential density on Country Club Drive south of Harmony Grove Rd, <b>where there is not a second exit to cross the creek if the Country Club bridge across the Escondido Creek becomes blocked</b>, will especially endanger the lives of the rural residents who already live south of Harmony Grove Rd, some of whom have lived there for decades. High volume traffic from the proposed development will block their only exit during an evacuation. Waiving the secondary access requirement, as is proposed, is unconscionable in such a known and designated high risk fire area.</p> <p style="text-align: right;">I26-5</p> <p>According to the Wildland Urban Interface Risk Assessment RSF28W, "Harmony Grove is located in an upper canyon bowl within an historic fire corridor with a history of loss of life and extensive structure loss." It further states that the area has, "serious entrapment threats along Escondido Creek, in the Spiritualist Camp, and upper Cordrey Rd. &amp; Crestwind Dr. Areas." Allowing the proposed project to increase the already existing entrapment danger to these areas south of the Escondido Creek without requiring an additional exit road and bridge to allow for sufficient evacuation capacity is both foolish and dangerous.</p> <p style="text-align: right;">I26-6</p> <p>The developers proposing this project knew or should have known the County's General Plan, the Community Plan, the zoning and the fire hazards in this area before they purchased this property. They undoubtedly purchased it at a lower price than they would have had it been zoned for the density they are seeking, and they speculated that they could get it up zoned, in spite of the plan not being consistent with the rural character of Harmony Grove, in order to increase their profits. While there may be a housing shortage in parts of the County with more amenities and infrastructure, there is no shortage of new housing in this area. New homes in the adjacent Harmony Grove Village have been very slow to sell. There is also no transit within approximately three miles, and the assigned elementary school</p> <p style="text-align: right;">I26-7</p>	<p><b>Response to Comment I26-5</b> The County disagrees that the Project presents a fire risk or would impede evacuations of existing communities. The County has not "waived" a requirement, but is reviewing a Project that conforms to the applicable fire codes. Please see the Global Responses to Fire Hazard Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p><b>Response to Comment I26-6</b> In accordance with the County Fire Code, the Project has an ability to provide the Fire Code Official with findings to allow a modification that results in equivalent fire protection. Also, please note that the Wildland Urban Interface Risk Assessment (Rhode &amp; Associates 2016) further describes emergency evacuations and the perception that only one route was proposed for access/egress to the Project. The conclusion of that report's analysis was:</p> <p style="text-align: center;"><i>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. All participants expressed comfort that the proposed variance for the 800-foot single access road was acceptable.</i></p> <p><b>Response to Comment I26-7</b> The comments are noted. These comments do not address the environmental analysis or adequacy of the EIR, and therefore do not require a response.</p>

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<p style="text-align: right;"><b>Comment Letter I26</b></p> <p>is approximately five miles away in another community. The district does not generally provide busing.</p> <p>Local government staff, including Public Safety personnel, routinely review such proposals as this General Plan Amendment request and sometimes may not raise or press issues, including safety issues, as they don't want to be seen as stumbling blocks to perceived progress by not signing off on projects they believe elected officials want. Existing residents safety, however, should not be jeopardized by unsuitable development due to political expeditiousness or potential future revenue for local government.</p> <p>This weeks news described fires in a rural area northeast of Lisbon, Portugal, where 63 people died, most of whom were trapped in or at their cars trying to evacuate a wooded area. Please don't allow that to happen in Elfin Forest, Harmony Grove or Eden Valley. Our communities and the County of San Diego put years of time and millions of dollars worth of thought and effort into the current General Plan and, for the safety of all, it must remain intact.</p> <p>Sincerely,</p> <p>Nancy Goodrich Elfin Forest, CA 92029 760 473 5893</p> <div style="position: relative; margin-left: 400px;"> <div style="position: absolute; top: 180px; left: 420px; height: 150px; border-left: 1px solid black; border-right: 1px solid black;"></div> <div style="position: absolute; top: 180px; left: 420px; height: 150px; border-left: 1px solid black; border-right: 1px solid black;"></div> <div style="position: absolute; top: 265px; left: 435px;">I26-7</div> <div style="position: absolute; top: 395px; left: 435px;">I26-8</div> </div>	<p><b>Response to Comment I26-8</b></p> <p>The comments regarding fires in Portugal are acknowledged, but the conditions there vary from those of the Project. These comments do not address the environmental analysis or adequacy of the EIR, and therefore additional response is not required.</p>