Response to Comment I27-1
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.

Response to Comment I27-2
This is a summary introductory comment that introduces Response to Comment I27-3. The response is provided to that more detailed comment, below.

Response to Comment I27-3
Each project proposing a General Plan Amendment (GPA) will receive its own review under CEQA. This response addresses only the Harmony Grove Village South (HGV South) Project.

The Multiple Species Conservation Plan (MSCP) Draft North County Plan is a draft document in progress.

The County’s Habitat Evaluation Model for the MSCP Draft North County Plan is a regional model that should not, and is not intended to, be used to interpret site-specific (i.e., parcel level) biological resources value. Further, the model is based on GIS data generally mapped at a regional scale of 1:24,000 (i.e., 1 inch on the map is equivalent to 24,000 inches on the ground) and also affords greater weight to certain resources that are targeted for conservation in the planning area (e.g., federally endangered Stephens’ kangaroo rat [SKR] [*Dipodomys stephensi*]) and/or expressed by the large-scale data (e.g., grasslands). The model also does not necessarily take into account current species’ range information. For example, the Model may identify grassland areas as having high value due to their potential association with SKR. SKR is not expected to occur on the Project site due to range restrictions, however, and therefore, the on-site grasslands, do not deserve the heavier weight afforded to them in the model. This is one example of why the Habitat Evaluation Model should not be used to determine the site-specific value of habitat. Similarly, the Project site is identified as having no value or “None” in the County’s California Gnatcatcher Habitat Evaluation Model Results for the MSCP Draft North County Plan, which is contradictory to the site-specific biological resources studies completed for the Proposed Project. Habitat value is addressed extensively in the EIR based on site-specific studies, not only with respect to the habitat that occurs on the Project site itself, but also that which occurs in the local area surrounding the site.
The assessment of the habitats within the Project site and habitat connectivity is discussed in Subchapter 2.3, *Biological Resources*, of the EIR and in the *Biological Technical Report*, Appendix E. Multiple site visits were conducted from 2014 through July 2017, and detailed vegetation mapping and sensitive species surveys were completed by technical specialists with the appropriate permits. Part of the evaluation has included the functions supported by the habitat. The site has also been visited by representatives of the wildlife/resource agencies, who concurred with the on-site mapping. Please refer to their letter (F1), which indicates substantial concurrence with Project findings (mapping and function classifications).

Relative to the discussion regarding on-site preservation recommendations based on the U.S. Fish and Wildlife Service (USFWS) Notice of Preparation letter, following the agency site visit, and an on-the-ground assessment, the letter provided in response to the EIR following review of the full Project analyses acknowledged that although individual sites are the starting point during review of projects with the draft pre-approved mitigation area (PAMA), the:

...75 percent conservation target is an average across PAMA, where some areas will be conserved at higher levels and others at lower levels.... We then factor in other variables including the importance of the project area to identified biological core and linkage areas within the preserve and the presence of critical biological resources.

Having seen the site and looked at the resources, the recommendations in the current joint USFWS and California Department of Fish and Wildlife (CDFW) letter focus on specifics related to off-site mitigation areas rather than proposing retention of existing site conditions.

Relative to the comment regarding permanent loss of highly functioning habitat, please refer to the above discussion.

Regarding effects on adjacent open space, the County respectfully disagrees. Potential edge effects have been fully discussed in EIR Subchapter 2.3, *Biological Resources*, under the headings “Core Wildlife Area (Guideline 7),” “Indirect Impacts/Edge Effects (Guideline 8),” Wildlife Access (Guideline 19),” “Local and Regional Wildlife Corridors and Linkages (Guideline 20),”
and “Cumulative Impacts to Wildlife Movement and Nursery Sites.” In particular, Guideline 8 discussion specifically addresses increased human activity, domesticated animal effects, introduction of invasive non-native plant species, and night-lighting. The EIR concludes that Project-related long-term impacts to sensitive species from indirect edge effects would be less than significant. In addition, consistent with the requirements of Mitigation Measure M-BI-1a:

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Required installation of fencing and signage around the BOS [biological open space], dedication of a BOS easement, protection of the BOS by a limited building zone easement, and implementation of the RMP for the Proposed Project, would further minimize potential edge effects over the long-term (EIR pg. 2.3-33).
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Specifically regarding the area north of the Project, the Project would place residential uses southerly of the northern Project boundary, away from Escondido Creek. There is a substantial buffer between sensitive habitat and Project residential use areas. Specific to Escondido Creek, there are opportunities for enhancing and restoring the current conditions, including areas within lands managed by TECC, which are currently in a degraded state and suffer from both back-up (rather than constant free-flow conditions) where the creek crosses under the at-grade crossing in culverts, and scour, where the momentum of water flowing through the culverts gushes out and hits the creek bed at high velocity. The bridge crossing of the creek would provide for wildlife movement along the creek a route under the County Club Drive crossing (as opposed to over the road) and would prevent associated pollutants on the roadway from washing directly into the creek. During implementation of the bridge, invasive non-native plants would be removed, the creek bed would be regraded to more natural and free-flow conditions, and revegetation with appropriate native species would occur. These actions would be expected to benefit the sensitive (and other) native species in the area.

Project implementation would result in over 34 acres of native habitat being conserved as permanent managed biological open space. This land is currently unpreserved and designated for development in the General Plan. Contrary to the comment, the addition of another block of valuable habitat connecting with the existing Del Dios Highlands Preserve would provide for a larger, contiguous block of preserved habitat in the local area.
Focused discussion, including the lack of a corridor across the property in the
2009 MSCP Draft North County Plan, is provided under the headings “Habitat
Connectivity and Wildlife Corridors,” “Escondido Creek,” and “Del Dios
Highlands Preserve/Elfin Forest Recreational Reserve,” on EIR pages 2.3-16
through 2.3-21. Potential impacts are also detailed in discussion of six separate
guidelines (Guidelines 19 through 24) the County uses to thoroughly evaluate
connectivity issues. These Guidelines focus on access, interference with
connectivity, artificial corridors, indirect effects, lack of adequate width, and
lack of visual continuity. Discussion is detailed on EIR pages 2.3-38 through
2.3-43. The EIR concludes for each guideline that impacts would be less than
significant.

Comments in the second paragraph are noted. Please refer to responses for
Letters O4a through O4c on behalf of the Escondido Creek Conservancy, and
O3a through O3c on behalf of the Elfin Forest – Harmony Grove Town
Council, respectively, for responses to their letters.
Response to Comment I27-4

Comments regarding evacuation conditions during the 2007 wildfires are noted and are not in variance with the EIR’s analysis.

The EIR states that the Project is within a Very High Fire Hazard Severity Zone (VHFHSZ) and that fact is referenced in the Project's FPP (DUDEK 2016). Based on its location in a VHFHSZ, the Project is required to provide for a level of planning, ignition-resistant construction materials, access, water availability, fuel modification, and construction methods that have been developed specifically to address and mitigate issues of developing within a VHFHSZ. The Project meets and exceeds these requirements by implementing fire and building codes and exceeding specific codes to provide additional fire protection based on the site, the development plan, and related constraints.

Please also see the Global Responses to Fire Hazard Impact Analysis and Adequacy of Emergency Evacuation and Access.

Response to Comment I27-5

Please refer to Response to Comment I27-4. Regarding average daily traffic and levels of service, please refer to Subchapter 2.2, Transportation/Traffic, of the EIR. The County requires new proposed projects to assess traffic impacts in their setting to accurately depict potential impacts. In this case, the modeling was conservative as it included projected Harmony Grove Village traffic as already built, and placed Project traffic on top of that in order to isolate and identify Project contributions.
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| **Response to Comment I27-6**  
The comments regarding Lilac Hills Ranch are noted, but do not pertain to the HGV South Project environmental analysis and no response is required. |
| **Response to Comment I27-7**  
See Response to Comment I27-6. The Proposed Project is also distinguishable from “new village areas” as it is adjacent to an existing village; please see Global Response to Project Consistency with General Plan Policy LU-1.4. |

Environmental impacts associated with HGV South are detailed in the thorough EIR prepared for the Project, based on analyses prepared by technical specialists approved by the County for technical review. The only impacts identified as unmitigated are identified in Subchapters 2.1, Aesthetics, and 2.2, Transportation/Traffic, and 2.6, Air Quality; with full explanations of why those impacts would occur and when they would be mitigated. The aesthetics impact would resolve due to passage of time based on temporary construction impacts. The traffic and air quality impacts are related to actions by other CEQA agencies that are beyond the purview of the County and would be solved by implementation of mitigation measures within the city of Escondido following City approval of proposed mitigation measures for traffic and by use of updated planning data provided by the County to SANDAG and the San Diego Air Pollution Control District. Please see Sections 2.1.6, 2.2.7, and 2.6.6 of the EIR, respectively. The County does not agree that the Project would jeopardize emergency responders or make foreseeable risks more hazardous. |

Please see Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.
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| **Response to Comment I27-8**

These comments are noted; however, they largely do not address the environmental analyses in the EIR, and therefore do not require a response. The hazards evaluation relating to fire was completed by technical specialists knowledgeable of wildfire hazards, and in close coordination with the emergency service providers. Their approach, including the technical modeling critical to understanding wildfire movement, is informed by similar events throughout the County, including events in the Project area, such as the Cocos Fire.

Please see the Global Responses to Fire Hazard Impact Analysis and Adequacy of Emergency Evacuation and Access.

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| **Response to Comment I27-9**

Comments noted. Please see the Global Response to General Plan/Community Plan Amendments CEQA Impact Analysis.

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**Comment Letter I27**

During recent public hearing (February 2017) in Escondido (at California Centre for the Arts CCA) the California Public Utilities Commission (CPUC) hosted two (2) public hearings to obtain public comments on proposed SDG&E Rate Increase, to recover costs of wildfire during 2003 and 2007. At those public hearings, CPUC received overwhelming public response during long hours of public testimony during afternoon and evening meetings from San Diego residents who attended in person to inform regulators from California Public Utilities Commission of the many technical reasons why SD residents so strongly opposed the SDG&E proposed rate hike. CPUC state regulators also received overwhelming number of written opposition comments that were sent online. During the CPUC public comment period in early 2017 on SDG&E proposed rate increase, Escondido Chamber of Citizens (ECOC) submitted written comments indicating: “The above ground poles SDG&E proposed will not safely offset increased fire hazards in back county. It has been established (by CalFire) that 2007 fires were caused by SDG&E’s malfunctioning equipment, and maintenance neglect. Why is undergrounding utility poles absent from consideration?”

The information regarding strong public opposition during public hearings on SDG&E rate increase in early 2017 that San Diego residents sent to California Public Utilities Commission (CPUC) may not be directly relevant to this proposed Draft EIR prepared for Harmony Grove Village South, however it is indirectly relevant. I feel it is vitally important in this Draft EIR to develop a context supporting existence of overwhelming regional concern over fire hazards in fire prone areas in north San Diego County, which were formed the hard way from experience, instead of theoretical modeling, or computer simulation for risk assessment. Allow me to emphasize this is why the evidence-based history here led to zero-tolerance for error, and perpetual vigilance by north San Diego County residents, and Escondido Chamber of Citizens (ECOC) to actively participate by preparing comments during early environmental review stages on new projects.

Public Stakeholders and Escondido Chamber of Citizens Want Projects That Do Not Propose GPA’s.

In the future, wherever County processes more GPA projects currently in the pipeline, which are inconsistent with General Plan density limits, or where foreseeable and significant impacts are observed, where project impacts appear underestimated, inaccurately assessed for significance, or when project are not sufficiently offset by mitigation measures, it is foreseeable that public stakeholders will also recommend denial. After County spent years of community outreach, to define and develop reasonable density limits, specific development standards, defined the urban boundary, and spent over 18 million on a General Plan updated in 2015, many public stakeholders think it would be fiscally irresponsible for County of San Diego to discard community driven values, or Community Planning Group recommendations which should be applied to control Land Use in San Diego, especially in north SD County where many unique rural communities with distinct identity features exist, and are cherished by those living there, and visitors who use leisure time for ecotourism, and visit rural areas to escape urbanization pressure and excessive traffic.

Thank you in advance for thoughtful consideration.

Patricia Borghmann

抄: Ann Van Leer, The Escondido Creek Conservancy (TECC)
Christine Nava, President, Escondido Chamber of Citizens (ECOC)