

COMMENTS	RESPONSES
<p style="text-align: center;"><b>Comment Letter I3</b></p> <p style="text-align: right;">June 18, 2017</p> <p>Planning &amp; Development Services 5510 Overland Avenue, Ste. 310, San Diego, CA 92123</p> <p>RE: HARMONY GROVE VILLAGE SOUTH, 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>To Whom It May Concern:</p> <p>I appreciate the opportunity to review and provide comment on the Draft Environmental Impact Report ("DEIR") for the proposed Harmony Grove Village South Project ("Project"). The DEIR fails to address or inadequately addresses numerous environmental impacts which will result from the Project. The DEIR is inadequate in the following respects:</p> <ul style="list-style-type: none"> <li>• The Project proposes changes to the natural grading of the Harmony Grove area. The DEIR fails to address how the proposed changes in grading will affect the amount of shade and shadow cast upon nearby parcels or how an increase in shade or shadow will affect (1) local plant and animal life; and (2) the ability of existing residents to make full use of their own parcels, including shade- and sunlight-sensitive uses, such as the use of solar panels. The DEIR should address changes in shade and shadow over the entire year, as the angle of the sun changes throughout the year.</li> <li>• The Project as proposed will reduce the amount of vegetation, including native trees and shrubs in the area. Vegetation serves to reduce the amount of greenhouse gases in the atmosphere by sequestering greenhouse gases such as carbon. In the section of the DEIR on greenhouse gas emissions, the DEIR does not address the impact that the destruction of vegetation will have on the amount of greenhouse gases emitted into the atmosphere as a result of the Project. The DEIR also does not propose any measure to mitigate this effect.</li> <li>• The destruction of vegetation as a result of the Project will also reduce the amount of evapotranspiration occurring in the area. The DEIR does not address how this will change the temperature in the area. The DEIR does not propose any measures to mitigate this effect.</li> <li>• The Project will involve the laying of significant amounts of asphalt and concrete in the area to serve the Project. Asphalt and concrete absorb sunlight and transmit heat to a far greater degree than the vegetation and soil which the asphalt and concrete is replacing. The DEIR does not address how the added concrete and asphalt will change the temperature in the area by transmitting additional heat. The DEIR also does not propose any measures to mitigate this effect.</li> </ul>	<p><b>Response to Comment I3-1</b></p> <p>The introductory comments are noted. Please refer to information below in response to specific comments.</p> <p><b>Response to Comment I3-2</b></p> <p>The Project will entail grading. On-site vegetation in the Project development footprint would be removed. Impacts to that vegetation, and associated wildlife, have been fully addressed in the Project EIR (see Subchapter 2.3, <i>Biological Resources</i>). Relative to shade and shadow, as described in EIR Chapter 1.0, <i>Project Description</i>, and Subchapter 2.1, <i>Aesthetics</i> (in particular), however, grading has been designed to follow the general rise and fall of the underlying existing terrain (please refer to EIR Figure 2.1-10). As noted in the comment, the angle of the sun changes over the year and conditions on any given day at any specific hour currently vary, and will continue to do so under future conditions.</p> <p>Solar panels are generally located on western and southern exposures. These sides/exposures face "away" from the Project, which is located to the east. The closest off-site uses are along Cordrey Drive next to the western Project boundary. In this area, uses west of Project lots 124, 125, 128, and 129 would be at higher elevations than Project lots. Adjacent to Project lots 132, 133, 137, and 140, there are three existing off-site homes with lots that abut parts of the Project site proposed for development. The existing elevations in the area range from approximately 640 feet above mean sea level (AMSL) to approximately 690 AMSL in the area from the Project boundary to the most western future row of homes. Post-development, the elevations of the western-most pads down to the western Project boundary would contain the same elevations. The overall consistency of terrain elevation combined with the small number of homes that directly abut developable portions of the Project and the focus of solar gain on surfaces facing away from the Project result in this issue being less than significant. This is not an issue required to be addressed in the EIR,</p>

	<p>but incorporation of this comment and response in the FEIR results in its inclusion.</p> <p><b>Response to Comment I3-3</b></p> <p>Sequestration was one of the items reviewed during public review and third-party peer review of the greenhouse gas (GHG) study. Consistent with this comment, information has been added to the Final EIR in Section 3.1.3, <i>Greenhouse Gas Emissions</i>. As stated in that text, by removing existing vegetation, the Project would result in a one-time carbon exchange. This was calculated to be a one-time loss of 729 metric tons of carbon dioxide equivalent (MT CO<sub>2</sub>e). Also, as stated in the FEIR, the loss of sequestered carbon estimate is conservative as the Proposed Project would also plant new landscape trees (approximately 2,050), which would sequester additional carbon through each growth cycle, resulting in increasing amounts of sequestered carbon each year for the life of the tree. As shown in the Sequestration Memorandum in the Greenhouse Gas Emissions Report, Appendix J to the FEIR, the projected amount of MT CO<sub>2</sub>e sequestered under the Project would be approximately double the amount of sequestration without the Project (1447.86 MT CO<sub>2</sub>e). Furthermore, as required in Subchapter 2.3, <i>Biological Resources</i>, of the EIR, impacts to existing on-site sensitive habitats would be fully mitigated through on-site or off-site preservation and/or purchase of credits as an approved mitigation bank, thus providing long-term conservation value. To provide a conservative analysis, although the <i>loss</i> of vegetation was included as an impact, the <i>reduction</i> of carbon emissions attributable to the Proposed Project through landscaping and the additional off-site vegetated lands was not factored into the analyzed emissions totals. Impacts remain less than significant based on Project design and no mitigation measures are required. Similarly, no modifications to the EIR are required, although this comment and response in the FEIR results in its inclusion.</p> <p><b>Response to Comment I3-4</b></p> <p>Evapotranspiration is basically the process of water leaving plant leaves (as well as from the soil and other surfaces and evaporating into the atmosphere). This is a localized variable, and once it disperses to approximately a couple hundred feet from the source (such as in large vegetative massing) it loses noticeable effect. Notable amounts of evapotranspiration can be expected near plants with broad, dark leaves. Scrub habitats are generally not considered to</p>
--	--

COMMENTS	RESPONSES
	<p>release a lot of water into the atmosphere. They are drought-adapted, do not have a large surface area on their leaves, and have low evapotranspiration rates. Regardless, please refer to Response to Comment I3-3 regarding the robust planting scheme associated with the Project, which would increase evapotranspiration rates on the Project. This would be expected to additionally increase due to irrigated landscaping, as the soil would also release water vapor into the atmosphere. No significant impacts would occur, and no mitigation is required. Similarly, no modifications to the EIR are required, although this comment and response in the FEIR results in its inclusion.</p> <p><b>Response to Comment I3-5</b></p> <p>Concrete is not expected to substantially contribute to heat sink. Concrete has a high albedo; it reflects heat rather than absorbing it. The Project will have some blacktop, primarily associated with Project roads. These areas are separated by other Project uses, however, including structures with cool roofs (designed to not absorb heat) and a robust landscaping plan. No significant impacts are anticipated, and no mitigation is required. Similarly, no modifications to the EIR are required, although this comment and response in the FEIR results in its inclusion.</p>

COMMENTS	RESPONSES
<p style="text-align: right;"><b>Comment Letter I3</b></p> <ul style="list-style-type: none"> <li> <div style="display: flex; justify-content: space-between;"> <div data-bbox="275 337 913 399"> <p>• The Project proposes to significantly increase the population of the Harmony Grove area. The DEIR does not address the extent to which the additional population will lead to an increase in crime in the area.</p> </div> <div data-bbox="940 350 978 370">I3-6</div> </div> </li> <li> <div style="display: flex; justify-content: space-between;"> <div data-bbox="275 423 913 633"> <p>• The DEIR admits that, because the Project is residential, it will likely lead to the introduction of domestic predators (e.g. dogs and cats) to the surrounding habitat. The DEIR fails to address the impact of the proposed introduction of additional domestic predators to wildlife in the area. The DEIR merely states that the area is “already subject to some level of disturbance and predation by domestic animals.” This statement is not sufficient. Even if some predation by domestic animals currently occurs, the introduction of additional domestic predators will undoubtedly change the level of predation that occurs. The DEIR must address the extent to which the Project will impact the amount of predation by domestic animals in the area.</p> </div> <div data-bbox="940 503 978 522">I3-7</div> </div> </li> <li> <div style="display: flex; justify-content: space-between;"> <div data-bbox="275 657 913 846"> <p>• The DEIR includes a section on Public Services, which discusses possible impacts to fire protection and police protection in the area. The DEIR fails to address the impact that the Project will have on the provision of emergency medical services via ambulance. The Project proposes to significantly increase the population to be served by the Rancho Santa Fe Fire Protection District, but does not propose any increase in the number of ambulances serving the area. Table 3.1.9-2 clearly shows that there is no intention to staff the New Harmony Grove Station with an ambulance. The DEIR should address how this increased strain on the ambulance services in the area will impact the safety of residents.</p> </div> <div data-bbox="940 724 978 743">I3-8</div> </div> </li> <li> <div style="display: flex; justify-content: space-between;"> <div data-bbox="275 870 913 1271"> <p>• The DEIR proposes an increase in the amount of water passed through what the DEIR refers to as “Existing Drainage System 300.” The DEIR fails to fully explain the current state of this “existing drainage system.” Existing Drainage System 300 is a dry creek bed which crosses multiple private parcels as well as Cordrey Drive. To pass Cordrey Drive, any water sent along this dry creek bed will need to pass through a small culvert. The DEIR fails to address whether the culvert is sufficient to handle the flow of water proposed to be introduced to the dry creek bed. The culvert itself was built prior to 1980 and was not installed with the idea that it might be used to serve a dense residential development like the one proposed by the Project. If the culvert fails, it will likely result in flooding across Cordrey Drive and flooding to the adjacent private residential properties. Residents located south of the culvert will be trapped by any flooding that occurs. The DEIR should address whether the culvert and the dry creek bed are capable of supporting the amount of additional drainage that will result from the Project. Additionally, the DEIR should consider what will happen if the dry creek bed and culvert are not sufficient and propose mitigating measures. The DEIR also does not discuss whether any of the private property owners whose land will be used for this additional drainage will be in any way compensated for the use of their land or if the use of private land by the Project is even a viable option.</p> </div> <div data-bbox="940 1027 978 1047">I3-9</div> </div> </li> </ul>	<p><b>Response to Comment I3-6</b></p> <p>The County acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. An increase in population does not necessarily translate to an increase in crime, and the commenter does not provide any evidence as such. One of the essential premises of CEQA is that it analyzes a physical impact on the environment. The commenter’s interpretation of crime due to an increase in population is not considered a physical impact on the environment under CEQA; therefore, no further response is required.</p> <p><b>Response to Comment I3-7</b></p> <p>The EIR acknowledges the introduction of domestic predators (e.g., dogs and cats) has the potential to harm native wildlife species; however, the EIR text from which the comment cites also discusses features included as part of the Project to reduce disturbance and predation to wildlife as a result of the increase of domestic predators. As stated in Subchapter 2.3, <i>Biological Resources</i>:</p> <p style="padding-left: 40px;"><i>The Proposed Project is residential in nature, so domestic predators (e.g., dogs and cats) may be introduced to the surrounding habitat. Although such introductions have potential to harm native wildlife species, the site is adjacent to existing rural residential development and is already subject to some level of disturbance and predation by domestic animals. In addition, the aforementioned permanent fencing that would be installed around Project BOS would preclude access by domestic predators (EIR pg. 2.3-33).</i></p> <p><b>Response to Comment I3-8</b></p> <p>As stated in EIR Section 3.1.8, <i>Public Services</i>, emergency ambulance service for County Service Area 107 is outsourced to a private vendor (EIR pg. 3.1.8-2). A routine part of development fees would be a contribution to the Rancho Santa Fe Fire Protection District (RSFFPD), which would allocate use of those funds as they see fit: it could be used to support HGV fire station services.</p>

COMMENTS	RESPONSES
	<p><b>Response to Comment I3-9</b></p> <p>The Project <i>Drainage Report</i>, <i>SWQMP</i>, and <i>Hydromodification Management Plan</i> have been prepared in conformance with the County of San Diego requirements for water quality and quantity control. BMPs (capture and reuse, modular wetlands, detention of increased flows, and hydromodification management control) are proposed for the Project, which will attenuate/address the effects of development in accordance with County regulations. As a result of employing detention and hydromodification management control, the Project does not propose an increase in flows to System 300.</p>

COMMENTS	RESPONSES
<p style="text-align: right;"><b>Comment Letter I3</b></p> <ul style="list-style-type: none"> <li data-bbox="275 315 894 505">• The DEIR fails to adequately address the increase danger of fire created by the Project. The Project proposes to add hundreds of additional residents to a “Very High Fire Hazard Severity Zone” which has experienced numerous wildfires recently and over a very short period of time, while relying on only a single ingress/egress. The DEIR provides no information on how all these additional residents and domestic animals will be housed in the event of an evacuation or what the expense to the county of doing so will be. Evacuations are extremely frequent in the area, even in those years where local residences aren’t destroyed by fire (as several were during the 2014 Cocos Fire).</li> <li data-bbox="275 529 894 846">• In the event of a serious fire incident, even with the “mitigating measures” that are proposed as part of the Project, some number of residents of Harmony Grove will die. It is disingenuous of the DEIR to claim that such a large number of people can be evacuated quickly enough with only a single ingress/egress. Given this reality, the DEIR should address what effects a significant loss of life will have on the area. If large numbers of residents are killed in their homes or while attempting to evacuate, it may impact the amount of money available to rebuild the area after a fire. It will certainly put a strain on county resources both in investigating the deaths and providing services to the survivors. There may also be significant legal liability to the county, which will affect the money available to provide services countywide. The DEIR should provide accurate information concerning the risk of death to residents and the effect those deaths will have upon the area. The county may elect to accept the risk that residents will die as a result of the Project. However, they must do so while in receipt of all of the relevant information, which the DEIR currently does not provide.</li> </ul> <p>Sincerely,</p> <p><u>/s/ Jessica F. Dummer</u></p> <p>Jessica F. Dummer 2966 Cordrey Dr., Escondido, CA 92029</p>	<p><b>Response to Comment I3-10</b></p> <p>Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p><b>Response to Comment I3-11</b></p> <p>Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access, which address Project conformance to Fire Codes and standards. Potential projected specific effects resulting from future fires are speculative at this time and, as such, are not CEQA topics requiring discussion.</p>