




COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter I37</p> <p>June 19, 2017</p> <p>Ms. Ashley Smith Land Use & Environmental Planner 5510 Overland Avenue, Suite 310 San Diego, CA 92123</p> <p>REFERENCE: 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-08-006.)</p> <p>Dear Ms. Smith,</p> <p>Thank you for the opportunity to comment on the above referenced DEIR for the proposed Harmony Grove Village South. I am attaching a table (HGVS DEIR Notes) of detailed comments referencing pages and topics of concern regarding the DEIR, which I am sure will be clarified in the next Environmental Impact Report. In addition to the attached remarks, I would like to make some more general comments related to the Project as a whole.</p> <p>First and most importantly, this project is being proposed for a parcel of land with only one road in or out, Country Club Drive. In addition, the road dead ends 1.3 miles from Harmony Grove Road. Approving a high density, 453 homes 1-4 stories high, development in a rural area which has been designated a Very High Fire Hazard Severity Zone (VHFHSZ)," by Cal Fire would seem to be an accident waiting to happen. In the 15 years since we built our house in Harmony Grove, we have had to evacuate three times. We have been very fortunate to have not lost our property, however, in the Coco's Fire we had a number of neighbors who weren't so lucky. As devastating as it would be to lose all of your possessions, that pales in comparison to a loss of life. Yesterday as I had been thinking of how to impress upon the County the fear we in the community have, to being trapped and unable to escape a fire because of a traffic jam. The traffic jam will be produced if Harmony Grove Village South is built as proposed. Then I heard of the tragedy in Portugal of 62 lives lost, most in their cars, when they were overcome by flames. We don't have to go far to see how that could happen. During the Coco's Fire hundreds of people were stuck in a traffic jam in the community of San Elijo trying to evacuate (Figueroa, Teri. "Coco's fire traffic jams to be reviewed." The San Diego Union Tribune. January 19, 2017. Web June 19, 2017. www.sandiegouniontribune.com/sdut-san-elijo-traffic-review-cocos-fire-san-marcos-2014jun07-story.html). Fortunately, the fire did not make it into San Elijo or this could have been a tragedy equal to the one in Portugal. Placing 453 homes in an area with one access road and a dead-end street over a mile long violates fire safety codes by the National Fire Protection Association (NFPA 1141 Standard for Fire Protection Infrastructure for Land Development in Wildland, Rural and Suburban Areas. National Fire Protection Association. 2016. Pg. 1141-9) and San Diego County (County of San Diego 2017 Consolidated Fire Code, 6th Edition. April 14, 2017. Pg. 22). The Project proposes to mitigate these issues by</p>	<p>Response to Comment I37-1</p> <p>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>Response to Comment I37-2</p> <p>Comments regarding the Project's access are noted and not in variance with the EIR analysis. 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 refuging 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. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p>

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It is our hope that the County will not risk the lives of our community members on untried theories of how to mitigate the single access and dead end road to appease a developer who won’t even be living in the County or the homes he builds.</p> <p>Secondly, Harmony Grove Village South has too many conflicts with the County General Plan, as well as the Elfin Forest/Harmony Grove Community Plan, to be developed as proposed. The County spent years and dollars developing a plan for smart growth in San Diego County that would put denser development near services, utilities, jobs, and transportation and less dense development in rural areas like Harmony Grove. As was stated in the County General Plan, “Rural areas are not appropriate for intensive residential or commercial uses due to significant topographical or environmental constraints, limited access, and the lack of public services.” (San Diego County General Plan: A Plan for Growth, Conservation and Sustainability. County of San Diego. August 2011. P. 3-8, Web. 1 May 2017). Harmony Grove is a rural/agricultural area with horses and other livestock, single family dwellings with acreage, and limited services. We are on septic, use propane, and access our property over a single road with an Arizona bridge which periodically floods keeping us from either getting into our properties, or out of our properties. We have a variety of native plants around us and value the small town rural atmosphere as can be seen by the community support of the Elfin Forest/Harmony Grove Town Council and The Escondido Creek Conservancy. The community worked with the County in the past when asked to accept some growth. In numerous community meetings with the County and the developer, the community had some input in the planning of Harmony Grove Village. With this planning, there were constraints put on Harmony Grove Village so it could not be used as a way to force more development on the community so as to ruin the rural character of the valley. Now the proposed project and its developers are attempting to force an inappropriately placed development on our community. At worst the Project should be kept to the requirements of the County General Plan, although even that may be larger than should safely be built given the limited road access.</p> <p>Third, the DEIR minimizes the significance of a number of factors in developing the Project site, such as steep slopes, water drainage, and protected biological resources. The applicant is asking for a waiver of three of the steep slopes on the parcel by claiming they are not a significant part of the view shed. The pictures that were provided in the DEIR did not include views from the west and the views from the south were from much farther away than the view hikers would have when they hike through the area. In addition to hikers, the parcel itself attracts local Escondido residents who come out to enjoy the views and the quiet of the valley. On the Project site we get people who come out for photography, videography, painting, dog</p>	<p>Response to Comment I37-3</p> <p>Comments noted. The Project proposes an Amendment to the County’s General Plan. The comments do not specifically address the adequacy of the EIR for which specific responses can be provided and therefore a response is not required. Please refer to Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis.</p> <p>Response to Comment I37-4</p> <p>Comments noted. Please see information regarding water drainage and protected biological resources in Response to Comment I37-5 and I37-6, below.</p> <p>Relative to the steep slope waiver, the issue is not whether slopes, even apparently steep slopes, are visible. To be protected under the Resource Protection Ordinance Section 86.604(e)(2)(cc)(3), slopes must have a slope gradient of 25 percent or greater, a minimum rise of at least 50 vertical feet, be connected to other areas of steep slope and visually distinguishable from non-steep slope areas. This issue is analyzed in detail in the Subchapter 2.1, <i>Aesthetics</i>, of the DEIR, as well as in the <i>Project Visual Impact Assessment</i> (Appendix B to the EIR) and the <i>Resource Protection Ordinance Steep Slope Waiver</i> (Appendix C to the EIR). In regard to the photos included in the comment letter, it appears that the heavily vegetated slopes in the back of the pictures behind the mail boxes are not proposed for development or modification, although some of the intervening flatter area would be subject to development. The EIR photographs were taken from some distance in order to present the smaller areas in their larger context. Each of the areas identified for a waiver request is both separated from other areas of steep slope rise and visually indistinguishable from adjacent areas that are slopes but are not categorized as steep slopes. Upon recommendation of approval of this encroachment by the Director of Planning and Development Services, and based upon the rationale provided in the cited documents, these encroachments qualify for the exception, and no significant impact is identified in the DEIR. The ultimate decision to approve the exception request will be part of the discretionary action of the Board of Supervisors.</p>

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<p style="text-align: right;">Comment Letter I37</p> <p>Finally, the County may want to consider some other potential ways of utilizing or developing the property which are more appropriate to the General Plan and the Community Plan. Given the risk of wildfire and entrapment, due to only one road out of the property, maybe this land would be better used as mitigation for a larger development in a more appropriate setting near services, transportation and with better access. An example would be the proposed Newland Sierra development still in the planning stage. According to the Voice of San Diego (Rivard, Ry. June 9, 2017, <u>Environmentalists Say Conservation Plan Is Being Used to Give One Development a Leg Up</u>) the Department of Fish and Wildlife has been asking Newland Communities, the potential developer, to find more mitigation property to preserve before approving the proposed development due to the presence of nesting California Gnatcatchers. The property proposed for the HGVS development also contains breeding gnatcatchers, so it could be a reasonable parcel for environmental mitigation for Newland Sierra or another development. This parcel also abuts the Del Dios Highland Preserve (DDHP) which could allow for freedom of movement of native animal species. It already has a trail that has been used to access the DDHP and the Elfin Forest Recreational Reserve by the community and other hikers who find out about it. Another appropriate use for this property would be 25 estate homes of 2 or more acres on septic. This is what the property was set for when we originally decided to build a house out here. We looked up the zoning before we built to make sure the zoning was appropriate to what we were building so we would not lose our investment once the adjoining property was developed. Twenty-five homes would put less people in danger of being trapped. It still would be risky added to the already 50 or so homes here, but less than the proposed Project.</p> <p>Thank you in advanced for considering our ideas and addressing the attached concerns regarding the DEIR.</p> <p>Sincerely,</p> <p>Debbie O'Neill Jonathan Dummer</p> <p>Attachments:</p> <ol style="list-style-type: none"> 1. HGVS DEIR Notes 2. Property Specific Request <p>cc: Ashley.Smith2@sdcounty.ca.gov sarah.ghassi@sdcounty.ca.gov bill.horn@sdcounty.ca.gov ron-roberts@sdcounty.ca.gov dianne.jacob@sdcounty.ca.gov greg.cox@sdcounty.ca.gov kristin.gaspar@sdcounty.ca.gov efhgtc@gmail.com marsenault@realcapitalsolutions.com</p> <div style="position: absolute; right: 0; top: 200px;"> <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> <div style="position: absolute; left: -10px; top: 0; width: 10px; height: 100px; border-left: 1px solid black;"></div> <div style="position: absolute; left: -10px; top: 0; width: 10px; height: 100px; border-right: 1px solid black;"></div> <div style="position: absolute; left: -10px; top: 0; width: 10px; height: 100px; border-right: 1px solid black;"></div> </div>	<p>Response to Comment I37-6</p> <p>Comments noted. These comments do not address the adequacy of the EIR and therefore do not require a response. It is noted, however, that the presence of California gnatcatchers, as well as adjacency of the Del Dios Highlands Preserve and wildlife movement, are fully analyzed in Subchapter 2.3, <i>Biological Resources</i>. Please note that the Project site is privately owned, and community members and hikers who enter without permission of the property owner are trespassing.</p> <p>Response to Comment I37-7</p> <p>The County acknowledges the comment and its general opposition to the Project as designed. This comment does not raise specific issues regarding the substantive environmental analysis conducted within the EIR. Because these comments do not address the adequacy of the EIR, they do not require a response. Nonetheless, please see Global Responses Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access. 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>

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The existing village should not need increased development in Harmony Grove in order to be successful as it is a separate development which was previously approved by the SDCBOS as a self-sustaining village. HGVS is attempting to tag on to the HGV development as if it is an extension of HGV when it is not. The land owners and developer are completely separate. This alternative however is more consistent with the General Plan of the Village concept of having less dense housing as you move farther from the village center.</p> </td></tr> <tr> <td>S-11</td><td> <p>Possible alternatives to the proposed project. No Project/No Development Alternative. "It also would not provide any of the amenities offered to the community at large relative to support of multi-modal transportation options,</p> </td></tr> </tbody> </table> <div data-bbox="924 1339 940 1357">1</div>	Page	Notes	S-1	<p>"Two transit centers – "Nordahl Road" and "Escondido Transit Center" – are also located nearby." 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"It also would not provide any of the amenities offered to the community at large relative to support of multi-modal transportation options,</p>	<p>Response to Comment I37-8</p> <p>The location of the transit centers in relation to the Project are noted. The County concurs with the information citing 0.5-mile as the accepted distance to and from transit centers for Transit Oriented Development; however, this is not a requirement for the Proposed Project. This information does not vary from the EIR; no further response is required.</p> <p>Response to Comment I37-9</p> <p>The County acknowledges the comment and opposition to the Project. HGV comprises a specific portion of the Community Plan. The comment does not raise any specific issues regarding the environmental analysis or adequacy of the EIR. Regardless, please see the discussion of Project massing in Subchapter 2.1, <i>Aesthetics</i> under the heading "Massing and Scale". Please also see Global Responses to Project Consistency with General Plan Policy LU-1.4 and General Plan/Community Plan Amendments CEQA Impact Analysis.</p> <p>Response to Comment I37-10</p> <p>Please note that the Project site is generally identified for semi-rural uses. Please see the Global Response to Project Consistency with General Plan Policy LU-1.4 which includes analysis of land use compatibility and the provision of public services.</p> <p>Response to Comment I37-11</p> <p>Please see the Global Response to Project Consistency with General Plan Policy LU-1.4 which includes analysis of land use compatibility and the provision of public services.</p> <p>Response to Comment I37-12</p> <p>Please see the Global Response to Project Consistency with General Plan Policy LU-1.4. The commenter's preference for the General Plan Consistent Alternative is noted.</p>
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The community members live in the rural Harmony Grove area to be away from developer created recreation and to enjoy natural open space and room between the neighbors.</td></tr> <tr> <td>5-11</td><td>No Project/No Development Alternative – "... improvements to creek water quality resulting from removal of the at-grade crossing and underlying culverts and re-creation of a free-flowing creekbed, also would not be expected to occur." Where is the data to substantiate that this would first of all, improve the water quality. Secondly, if we assume without data that the water quality is improved by a new bridge, it would likely be decreased by the amount of solvents, detergents, and trash run off coming off of a developed area due to the increase in asphalt, cement, and increased population.</td></tr> <tr> <td>5-12</td><td>Possible alternatives to the proposed project. General Plan Consistent with Septic Alternative. "... it would not achieve the underlying purpose of the Project of accommodating a portion of the projected population growth and housing needs in San Diego County by expanding an existing village that will further enhance and support the success of that village." First, this version would support a portion of the population growth and housing needs by providing single family houses. Second, this development should not be needed to support the success of the HGV village as that is a separate, already approved project that should be successful on its own as it was proposed. Third, as can be seen by the slow sales of HGV, high density housing out in Harmony Grove is not in high demand in San Diego County. People willing to drive out to Harmony Grove want a larger parcel of land that they can have animals on and maybe grow some food.</td></tr> <tr> <td>5-13</td><td>General Plan Consistent with Septic Alternative. "The alternative appears to better Physically respond to the site's physical variables through use of less grading, but would encroach into visible areas that would be retained as open space by the Proposed Project as a site feature." Although this alternative plan would encroach into areas that would be retained as open space in the proposed plan, likely the viewshed would be more consistent with the Community Plan as the homes would likely be single to two story buildings as is typical for single family homes instead of having four story buildings as are included in the proposed plan.</td></tr> <tr> <td>5-14</td><td>Possible alternatives to the proposed project. Senior Care Traffic Reduction Alternative. "When compared to the Proposed Project, the alternative offers a substantially fewer number of units and a singular product type, which limits the ability to fully support the economic and social success of the existing village and this alternative." Why does the county need another development in the area to support HGV given that they approved HGV as a single planned development supposedly without using it to encourage suburban sprawl.</td></tr> </tbody> </table> <div data-bbox="924 1365 938 1383">2</div>	Page	Notes		provision of a variety of passive and active recreational opportunities, or provision of a destination gathering place for the Project and surrounding areas." The community has not asked or wanted these amenities. There are plenty of planned developments in all portions of San Diego County that offer these types of amenities. 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Therefore, no further response is required.</p> <p>Response to Comment I37-15</p> <p>The County acknowledges the opposition to the Project and the commenter's preference for the General Plan Consistent with Septic Alternative. Relative to point 2, it is beneficial for communities to be inter-related. HGV South would support HGV services and amenities to a greater extent than the alternative.</p> <p>Regarding point 3, the San Diego Association of Governments (SANDAG) Regional Housing Needs Assessment shows that although the County has planned for the necessary number of housing units over the assessment period, the County is behind in the number of approvals one would expect per year if housing availability is averaged over the planning period. Without approval of a substantial number of residential units over the next few years, the County will have a housing shortage. The County has responsibility for providing a percentage of projected required housing. As noted in a recent study,^[1] the County has only issued building permits for 26 percent of the 22,412 units allocated to it by the state in its Regional Housing Needs Allocation process. The lack of housing supply can be considered to contribute to scarcity and high housing prices that put a strain on the general welfare of County residents. Guiding Principle 1 of the County General Plan (Chapter 2, pages 2-6 and 2-7) calls for the County to accommodate a reasonable share of regional growth. Accordingly, given the current widespread regional housing scarcity, the</p>
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	<p>County finds increasing housing supply to be within the general welfare of County residents.</p> <p>In addition, there is no commitment to solely place any specific number of the 22,412 projected units on any precise property within the County; however, this particular location, on an already disturbed site in proximity to employment centers and shopping opportunities in the cities of Escondido and San Marcos, and in proximity to SR-78, I-15, and the Nordahl Transit Station, is consistent with General Plan policies to site growth adjacent to existing amenities and not extend built environments into pristine areas of the County.</p> <p>[1] http://www.sdchamber.org/wp-content/uploads/2017/03/Housing-Score-Card.pdf (incorporated herein by this reference; the report is available for public review at the aforementioned website).</p> <p>Response to Comment I37-16</p> <p>The County acknowledges the commenter’s preference for the General Plan Consistent with Septic Alternative over the proposed Project. The comment does not raise any specific issues regarding the environmental analysis or adequacy of the EIR and is not inconsistent with the EIR analysis on this point.</p> <p>Response to Comment I37-17</p> <p>The comment does not raise any specific issues related to the adequacy of the EIR. Therefore, no further response is required.</p>

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HGV South would be required to provide the infrastructure and facilities needed to provide services to the Project either directly or through the payment of fees (Policy LU-12.1). A phasing plan has been provided as a part of the Project's Specific Plan to ensure that such facilities would be available at the appropriate time (Policy LU-12.2). Service providers would be required to provide "will-serve" letters indicating that they can provide service to HGV South prior to the recordation of final maps and the issuance of any building permits for the Project. (Community Facility Availability Forms have been received from service providers indicating that service will be available to HGV South [County Policy I-84].)</p> <p>Response to Comment I37-20</p> <p>The comment does not raise any specific issues related to the adequacy of the EIR. Therefore, no further response is required.</p> <p>Response to Comment I37-21</p> <p>The comment is not in variance with the information presented in the EIR and the potential effects of on-site and off-site improvements related to hydrology and water quality are discussed in EIR Section 3.1.4, <i>Hydrology/Water Quality</i>. The comment does not raise any specific issues related to the adequacy of the EIR. Therefore, no further response is required.</p> <p>Response to Comment I37-22</p> <p>EIR Subchapter 2.1, <i>Aesthetics</i>, discusses both the short-term and long-term effects visual effects of the Proposed Project. As stated in the subchapter:</p>
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	<p><i>The long-term visual effect of the Project from both KVs selected for detailed analysis would be related to the change from an undeveloped parcel to a village extension. Although the built nature of the Project would vary from the existing condition, it is expected to demonstrate a character that is consistent with the village overall, as well as the development pattern visible in the County, City of Escondido and distant City of San Marcos.</i></p> <p><i>Although the visual character of the site would change from existing conditions, Project development would be generally consistent with the relative scale of development planned in the area, as well as general distance from the structures, intervening uses and landscaping. The Project would not result in new dominant visual elements within the larger viewshed. The Proposed Project would be visually compatible with existing and planned surrounding uses, as well as the surrounding topographic features. For instance, the harmony court and farmhouse structures, encircling a common driveway and courtyard, mimic the compound formations on HGV. As noted above, the granaries' height and architectural projections would reference the steep and pointed peaks around the valley. Character compatibility, therefore, would result from the diversity of elements that would be visually consistent throughout the Project site based on conformance with the Project Specific Plan, as well as neighboring development (particularly nearby residential portions of the abutting HGV project). The scale and contrast between the proposed development and the surrounding area would not be dominant in views toward the Project site as the greatest number of viewers would either be looking toward the Project from the north (from a setting in the heart of HGV), or from the south, from which vantage point the Project would be seen as the southernmost part of a consistent HGV development pattern. Additionally, retention of the highest on-site existing topographic forms in the southern portion of the Project, retention of sight lines to surrounding mountains and ridgelines, and revegetation with native and/or locally compatible plants would lessen the visual dominance and</i></p>

COMMENTS	RESPONSES
	<p><i>scale of the proposed development features from all cardinal directions.</i></p> <p><i>Taking all these factors into consideration, although implementation of the Project would represent a change from the past, the combination of all Project elements, in conjunction with its setting at the HGV crossroads, would result in less than significant effects on the area's visual character or quality following Project buildout and vegetation maturity (EIR pp. 2.1-46 to 2.1-47).</i></p>

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The analysis the commenter is referring to were general site surveys which in turn influenced the proposed Project design, the effects of which are analyzed throughout the EIR. Please also see Response to Comment I37-15.</p> <p>Response to Comment I37-25</p> <p>If your home is located at 2966 Cordrey Drive or south of there, it appears to be located next to planned biological open space, and south of Project grading. If located to the north, it would be one of the few homes identified in the EIR with direct views onto the site. Regardless, the analysis addresses the site as a whole. As stated on page 1-5 of the EIR, "Sharp or abrupt grade transitions that do not appear natural would be avoided, general rise and fall in existing slopes would be followed, and the overall grading would conform to existing elevations at north, east and west edges of the Project." 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Redundancy has been built into the system as a result of service provider (Rincon MWD) requirements.</p> <p>Response to Comment I37-28</p> <p>The potential impacts associated with transportation of wastewater off site is included in EIR Subchapter 2.6, <i>Air Quality</i>, and Section 3.1.3, <i>Hazards and Hazardous Materials</i>, and technical appendices H, <i>Air Quality Analysis Report</i>, and K.2, <i>Hazardous Materials Records Review Update</i>.</p> <p>Response to Comment I37-29</p> <p>Thank you for identifying this typographical error. The cited text has been corrected on page 3.9-1 of the FEIR to be consistent with the comment, and existing text in Subchapter 2.1 on page 2.1.5. That DEIR text noted that the DDHP has a 1.5-mile long firebreak/trail, located at its closest point approximately 0.1 mile south of the Project boundary and 0.3 mile south of proposed development footprint, that extends from Del Dios Highway to intersect with the "Way Up" Trail in the EFRR; and that the EFRR maintains approximately 11 miles of trails transecting 750 acres overlaying portions of the ridgeline separating the Escondido Creek valley and the area surrounding Lake Hodges.</p> <p>Response to Comment I37-30</p> <p>Comment noted. The comment does not raise any specific issues related to the adequacy of the EIR. Therefore, no further response is required.</p> <p>Response to Comment I37-31</p> <p>This is a misunderstanding on the part of the commenter. As described in footnote 6 on page 1-20 of the DEIR, the Summit Trail "does not currently</p>
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	<p>exist and is not part of the Project. This potential trail would adversely affect Proposed biological open space and increase edge effects. It was therefore deleted following coordination with County Department of Parks and Recreation.”</p> <p>Response to Comment I37-32</p> <p>The County would like to clarify that EIR <i>Figure 1-20b, Landscape Plan</i> does include Note 11: “The plant pallet may be modified in the future design phases.” However, this change is restricted by Note 6, which requires a “Modified California Native” plant palette that utilizes drought-tolerant and native species. Therefore, while the species may change from what is noted in the Conceptual Landscape Plan, native and drought-tolerant species are still required.</p>

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The County was unable to locate the inconsistency in the Specific Plan.</p> <p>Response to Comment I37-35</p> <p>As stated in Chapter 1.0, <i>Project Description</i>, on page 1-19:</p> <p style="padding-left: 40px;"><i>Trails would be constructed with decomposed granite or similar soft surface material and would comply with appropriate San Diego County Trail Designation and County Design and Construction Guidelines. Fencing would be used as needed.</i></p> <p>The County requirements, fencing, and signs regarding biological open space would combine to keep users from encroaching on adjacent uses.</p> <p>Response to Comment I37-36</p> <p>As stated in EIR Section 3.1.9, <i>Recreation</i>, since mitigation for potential Project effects would be required prior to granting of building permits for the Proposed Project and cumulative projects approved by area lead agencies, and a number of mitigation avenues exist (e.g., payment of park fees, the dedication of park land, or a combination of these methods), the Proposed Project, along with cumulative projects would not increase the use of existing neighborhood parks, regional parks, or other recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated.</p>
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3.1.1 0-7	"Based on the analysis provided above, the Proposed Project would have less than significant impacts related to parks and recreation." Provide evidence of this statement. No actual reports were shown. Maybe an environmental/biological review should be done to evaluate how this Project along with the HGV development would affect the preserves. Possibly the cumulative effects of all the local developments that might impact DDHP and EFRR, as well as any preserved areas on the San Dieguito River Park should also be studied.	I37-37																			
3.1.5- 1	"Average annual precipitation in the project site vicinity (City of Escondido, 92025) is approximately 15.1 inches . . ." The project is outside of the city of Escondido in the 92029 zip code.	I37-38																			
4-3	"The underlying purpose of the Project is to accommodate a portion of the projected population growth and housing needs in San Diego County by expanding an existing village that will further enhance and support the success of that village . . ." This Project is not an expansion of the existing village in HGV as it is proposed. The village concept in HGV has the highest density in the center retail/commercial area with lesser density as residences move away from the center. HGVS property is outside of the village center across Harmony Grove Road and as proposed, actually puts higher density housing of multifamily dwellings adjacent to the multi acre parcel homes that currently exist in Harmony Grove. In other words, the highest density right next to the lowest density in Harmony Grove. This goes against the County's General Plan.	I37-39																			
4-3	"Contribute to the establishment of a community that encourages and supports multimodal forms of transportation, including walking and bicycling, by locating near regional employment and transit centers." Provide evidence of how this development brings employment and transit closer to the community. The two transit centers are at Nordahl Road and the Escondido Transit Center. These are not within easy walking distance (2.9 mi to Nordahl Sprinter approx.. 1 hour walking; 3.4 mi to Escondido Transit Center approx.. 1 hour 12 minutes walking). One-half mile has become the accepted distance for gauging a transit station's catchment area in the U.S. It is the de facto standard for planning TODs (transit oriented developments) in America. (Guerra, Erick, Cervero, Robert, and Tischler, Robert. "The Half-Mile Circle: Does it Best Represent Transit Station Catchments?" University of California, Berkeley. July 2011. Web. 1 May 2017. http://www.its.berkeley.edu/sites/default/files/publications/UCB/2011/VWP/UCB-ITS-VWP-2011-5.pdf Where are the local jobs? Most of the homebuyers will need to leave the community for employment.	I37-40																			
4-3	"Create a mixed-use development that is compatible with existing and planned development in the immediate vicinity of the property . . ." Provide further explanation of how this development is compatible as this seems false. The mixed-use development is incompatible with the current adjacent properties which are single family homes on ½ acre and larger parcels on septic with agricultural	I37-41																			
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Specifically noted are the retention of slopes exceeding 50 percent in permanent open space set-aside, avoidance of the 100-year floodplain, the consistency of the Project with the RPO, and improvements to degraded Escondido Creek and wildlife safety as a result of Project implementation. The amount of cut and fill in a topographically variable area does not render the Project incompatible. Similarly, the Project is consistent with the RPO through processes outlined in the ordinance—including ordinance exemptions for streets and utilities, a waiver of steep slope encroachment where those encroachments are found visually insignificant in compliance with the RPO, and strict compliance of no more than 10 percent encroachment into protected steep slope areas by individual lots, again in conformance with the RPO. These encroachments ultimately will be before the Board of Supervisors, but preliminary findings by the Director of PDS is that each of these encroachments conforms to the ordinance. They are extremely common elements of development in topographically variable areas, and also far more restricted than has been required of individually developed lots in the area (which are not subject to the RPO and therefore not restricted by it in terms of steep slope encroachment). Please also see Response to Comment I37-25 regarding grade transitions and Figure 2.1-10 of the EIR, which depicts existing and Project grades and illustrates their correlation and tie in points. Finally, and relative to visual perception of final grading effect, please also note, as stated on page 1-24 of the EIR, that: "Post-grading, only 32 acres, or 29 percent of the site, would contain lots and streets. The remainder of the Project would be in Biological Open Space, parks or landscaped/revegetated swaths between pads."</p> <p>Response to Comment I37-43</p> <p>Costs are not germane to environmental analysis required under CEQA unless secondary effects of that cost result in environmental impact. As a result, the potential increase in costs to the Applicant is not addressed. The purpose of the</p>
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	<p>alternative analysis in CEQA is to compare the impacts of an alternative to the those of the proposed Project. Therefore, the County disagrees that the proposed Project should be modified to incorporate components of an alternative. Please note, however, that consistent with the comment, a General Plan Consistent with Septic Alternative was evaluated (see Chapter 4.0, <i>Alternatives</i>, Subchapter 4.3).</p> <p>Response to Comment I37-44</p> <p>CEQA does not require evidence that project amenities are needed. CEQA Guidelines Section 15124 addresses project description, and Section 15124(b) specifically addresses objectives. That section states that the objectives should include the underlying purpose of a project and that clearly written objectives will (later) help the lead agency develop a reasonable range of alternatives, and, potentially will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary.</p>

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Transforming the project site wholly into permanently preserved open space is not considered viable. First, it is wholly speculative due to the lack of an identified potential buyer. Second, the amount of disturbed area on site does not translate into preserve habitat and would require long-term and expensive rehabilitation/revegetation. It is noted that the property has not been purchased by either of the abutting open space managers. Please also see the Global Response to Project Consistency with General Plan Policy LU 1.4 and Response to Comment I37-15 regarding need for housing in the County.</div> <div>Response to Comment I37-46</div> <div>Please see Response to Comment I37-14.</div> <div>Response to Comment I37-47</div> <div>The potential impacts associated with wastewater, including accidental contamination, are included in EIR Section 3.1.3, <i>Hazards and Hazardous Materials</i>, and technical appendix K.2, <i>Hazardous Materials Records Review Update</i>. 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The EIR states:</p> <p><i>The General Plan Consistent with Septic Alternative would be consistent with the existing General Plan land use designation of Semi-Rural. As shown on Figure 4-1, General Plan Consistent with Septic Alternative, this alternative includes 49 single-family residential homes on 1-acre or greater lots. Larger lot sizes are needed in order to meet the County's septic system requirements with respect to the Project's unique geologic/soils characteristics. The residential lots would have approximately 5,000-square foot pads that would be sited throughout the property in a dispersed, rather than consolidated, pattern that is based upon the soils characteristics found on the site. This alternative assumes an advanced on-site wastewater treatment septic system, requiring approximately 3,500 sf per lot.</i></p> <p><i>The manufactured slope located along Country Club Drive south of the WTWRF would not be built, and grading quantities overall are expected to total approximately 660,000 cubic yards (22 percent less than the Proposed Project grading of 850,000 cy). This alternative would initially grade approximately 56 acres (50 percent of the site), and develop on approximately 56 acres (or 50 percent of the site). Approximately 55 acres (also approximately 50 percent of the site) would be placed into open space set-aside containing some steep slopes and biological resources associated with each lot. This open space would not be placed into a preserve managed by an independent land manager, but would be restricted in use on each individual lot.</i></p>
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	occurred under this alternative, downstream pollution also could occur in Escondido Creek." Provide evidence that the specific septic system being proposed would be more likely to cause contamination to the creek than the in-site sewage treatment. HGV has already caused sewage contamination to spill into the Escondido Creek (Notice of Violation No. R9-2017-0062, CalAtlantic Homes, Harmony Grove Village Development, Escondido, San Diego County). According to the DEIR, "Due to the small size of HGV South, it is likely that the Project would truck solids to another wastewater treatment plant for dewatering. This would require transport to that facility by an estimated one truck per week." This appears to be a permanent plan. This would seem to be an area of potential spillage, not to mention the potential for lingering odors between trucking the solids out. This should be addressed in the DEIR. How will the development deal with the odor of solid storage and the risk of spillage in transporting this waste?										
4-13	"... it would not achieve the underlying purpose of the Project of accommodating a portion of the projected population growth and housing needs in San Diego County by expanding an existing village that will further enhance and support the success of that village." Provide evidence for why the development is needed for HGV to be successful. The existing village should not need increased development in Harmony Grove in order to be successful as it is a separate development which was previously approved by the SDCBOS as a self-sustaining village. HGVS is attempting to tag on to the HGV development as if it is an extension of HGV when it is not. The land owners and developer are completely separate. This alternative however is more consistent with the General Plan of the Village concept of having less dense housing as you move farther from the village center. The Project as proposed actually has higher density significantly outside of the village center in HGV and up against rural properties in the surrounding community.										
4-18	<u>General Plan Consistent with Sewer Alternative</u> "... although the Proposed Project would not directly impact on-site (non-RPO) jurisdictional waters, some brush management impacts south of the Project build footprint are anticipated to occur." The difference in jurisdictional water between this alternative and the project are not clear. The impacts due to brush management and build footprint should be detailed here in the proposed Project and specifically compared to this alternative." The difference in jurisdictional water between this alternative and the project are not clear. The impacts due to brush management and build footprint should be detailed here in the proposed Project and specifically compared to this alternative.										
4-20	"Also as a result of having substantially fewer units when compared to the Project, this alternative is less effective in optimizing the operational effectiveness of public facilities and services of the existing village." Explain why HGV needs more development in order to optimize operational effectiveness of facilities and services. Based on the plan developed for HGV and approved by the SDCBOS, HGV should be										

COMMENTS	RESPONSES
	<p><i>This alternative would not include any commercial, parks, or other recreational uses, including a community gathering locale, given the small number of residential units on site. While there are fewer homes under this alternative, larger lots spread over the entire site would still require an extensive road system and utility lines (e.g., potable water).</i></p> <p><i>The purpose of this alternative would be to provide consistency with the existing general plan land use designation and to reduce traffic and air quality impacts (EIR pg. 4-9).</i></p> <p>Furthermore,</p> <p><i>Off-site impacts to Escondido Creek jurisdictional wetlands would be similar to the Proposed Project because a bridge would be installed over Escondido Creek. Construction-period effects also would occur due to potential for on-site blasting in non-rippable areas during grading and potential for pile-driving requirements at the Escondido Creek bridge. Another creek-related issue would be potential failure of the planned alternative septic system. Review of the County's Environmental Health website (http://www.sandiegocounty.gov/content/sdc/deh/lwqd/lu_septic_systems.html) indicates that issues with leach fields and failure of other septic system elements are known to result in groundwater contamination. If such failure occurred under this alternative, downstream pollution also could occur in Escondido Creek (EIR pg. 4-11 to 4-12).</i></p> <p>Response to Comment I37-50 Please see the Global Response to Project Consistency with General Plan Policy LU-1.4 and Response to Comment I37-15.</p>

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Provide documentation on how the County would make this GPA.	<div>Response to Comment I37-51</div> <div>Consistent for all residents of this portion of Harmony Grove, some commercial opportunities are expected to be available at HGV, and other commercial opportunities (as well as the full range of other public amenities) are close by in the City of Escondido. Please also see the Global Response to Project Consistency with General Plan Policy LU-1.4 and Response to Comment I37-15.</div> <div>Response to Comment I37-52</div> <div>The Proposed Project is the Applicant’s preferred build option. The purpose of the alternative analysis in CEQA is to compare the benefits and impacts of an alternative to the those of the Proposed Project. The County disagrees that the proposed Project should be modified to incorporate components of an alternative.</div> <div>Response to Comment I37-53</div> <div>The numbers of trucks would be consistent with the largest potential project, the Proposed Project. As stated on page 1-15 of the DEIR: <i>it is likely that the Project would truck solids to another wastewater treatment plant for dewatering. This would require transport to that facility by an estimated one truck per week. Once biosolids are dewatered, they would be trucked to a landfill for final disposal, estimated to require one truck per month.</i></div> <div>The potential impacts associated with wastewater, including accidental contamination, are included in EIR Section 3.1.3, <i>Hazards and Hazardous Materials</i>, and technical appendix K.2, <i>Hazardous Materials Records Review Update</i>. Nuisance odor effects are addressed in Subchapter 2.6, <i>Air Quality</i>. The same requirements would apply to an alternative which proposed similar wastewater facilities and infrastructure.</div> <div>Response to Comment I37-54</div> <div>The treatment plant was designed by HGV to be of a size to serve that project. There have, however, been improvements in treatment technique and</div>
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COMMENTS	RESPONSES
	<p>efficiencies since that project was approved. In order for the Off-Site and Combined On/Off-Site Sewer Option Alternative to be feasible, the HGV WRF and the County would have to demonstrate capacity for that facility.</p>

COMMENTS	RESPONSES														
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Specify what the impacts could be.</p>	<p>Response to Comment I37-55</p> <p>The potential impacts associated with wastewater, including accidental contamination, are included in EIR Section 3.1.3 and technical appendix K.2. The same requirements would apply to an alternative which proposed similar wastewater facilities and infrastructure.</p> <p>Response to Comment I37-56</p> <p>The alternative analysis quoted in the comment is provided for comparative purposes only. CEQA does not require the same level of detail provided for the Proposed Project; therefore, it is not necessary to provide the details requested in the comment.</p> <p>Response to Comment I37-57</p> <p>The alternative analysis quoted in the comment is provided for comparative purposes only. CEQA does not require the same level of detail provided for the Proposed Project; therefore, it is not necessary to provide the details requested in the comment. As noted, if "other alternatives are explored in the future" they would be subject to CEQA review as well. The source for the information was EIR technical appendix Q, <i>Sewer Master Plan</i>. See Chapter 4 of that document.</p> <p>Response to Comment I37-58</p> <p>The potential impacts associated with wastewater, including accidental contamination, are included in EIR Section 3.1.3 and technical appendix K.2. The same requirements would apply to an alternative which proposed similar wastewater facilities and infrastructure.</p> <p>Response to Comment I37-59</p> <p>Operational studies potentially resulting in design plan changes or specifications would not be expected to affect existing environmental analyses because the analyses were conservative, based on the largest footprint and use factors that would be expected to result in environmental effects. The quote cited immediately preceded text explaining this:</p> <p><i>The Proposed Project analyzed the largest potential facility, with the associated largest footprint. As such, it represents a worst-case</i></p>
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COMMENTS	RESPONSES
	<p><i>footprint and potential alternative elements adequate to complete environmental analyses on site, and otherwise would place lines into already disturbed paved street (also affected by placement of Proposed Project utilities). Refinement of the alternative scenarios would not worsen environmental impacts associated with these lesser design scenarios.</i></p> <p>Future design changes would be expected to affect such items as the specific design of equipment internal to the Project WTWRF, pipeline couplings, etc. as specific products are confirmed. Changes that rise to the level of new analyses are not anticipated, but if they did occur, would require a conformity analysis consistent with County requirements, and if new impacts were identified, would require CEQA review. Moreover, please note that the analysis quoted in the comment is provided for comparative purposes only. CEQA does not require the same level of detail provided for the Proposed Project; therefore, it is not necessary to provide the details requested in the comment.</p> <p>Response to Comment I37-60</p> <p>Please see Response to Comment I37-59. As discussed in the paragraphs above and below the cited text, the overall CEQA impact levels (significant and unmitigable, significant and mitigable, or less than significant) would not change based on sewage treatment scenario because it is only one (relatively small) element of a larger development that drives the impact assessment. For example, use of an off-site option could result in incrementally fewer non-native grassland impacts, but such impacts would still occur, would still be identified as significant, and would still require mitigation for the Project overall.</p>

COMMENTS

RESPONSES

PROPERTY SPECIFIC REQUEST Comment Letter I37

SD7 [2004 Referral #58 Trapp & #59 Gray]

Property Specific Request: Change Land Use Designation from SR2/SR4/RL20 to SR0.5	
Requested by: Randy Coopersmith, Ted Shaw	
Community Recommendation	SR2/SR4 RL20
Opposition Expected ¹	Yes
Spot Designation/Zone	No
EIR Recirculation Needed	No
Change to GPU Objectives Needed	No
Level of Change	Minor

Notes:
1- Based on staff's experience

Property DescriptionProperty Owner:

T. H. Harmony Grove LLC

Size:

112 acres

4 parcels

Location/Description:

Located Southeast of Country Club Drive and the Harmony Grove Village Specific Plan;
Inside County Water Authority boundary

Prevalence of Constraints (See following page):

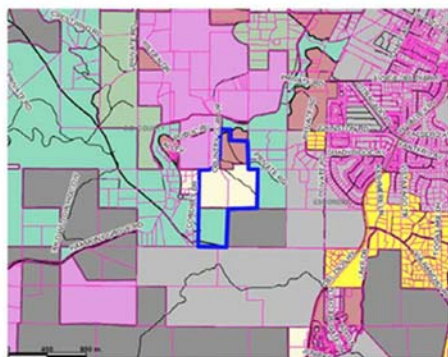
- - high; ◐ - partially; ○ - none
- ◐ Steep slope (greater than 25%)
 - Floodplain
 - Wetlands
 - Habitat Value
 - ◐ Agricultural Lands
 - Fire Hazard Severity Zones

Land Use

General Plan	
Scenario	Designation
Existing General Plan	1 du/4, 8, 20 ac
PC / Staff Recommendation	SR2/SR4/RL 20
Referral	VR2/SR2
Hybrid	SR2/RL 20
Draft Land Use	SR2/SR4/RL 20
Environmentally Superior	
Zoning	
Existing — A70, 4-acre minimum lot size	
Proposed — A70, 2 & 4-acre minimum lot size	



Aerial



PC/Staff Recommendation

Discussion

This property was originally a 2004 Residential Referrals 58: Trapp and 59: Gray to increase the density of the existing General Plan from Multiple Rural Lands and Impact Sensitive (1 du / 4, 8, 20 ac) to Village Residential 2 (VR2). In 2004 the Board of Supervisors directed staff to apply a VR2 designation to the property. Additionally there was a Plan Amendment Authorization (PAA) for the Harmony Grove Meadows and a project that began processing with DPLU in May 2005. The project was not supported by the Elfin Forest / Harmony Grove Town Council or the San Dieguito Community Planning Group (CPG). In November 2009 the project was withdrawn by the applicant and the property entered into foreclosure and is currently bank-owned.

Continued on next page.

SAN DIEGUITO [ELFIN FOREST - HARMONY GROVE]

Response to Comment I37-61

The baseline count of 220 was derived from the General Plan Land Use designation for the property (0.5-acre lots) which yields a gross number of 220. The staff yield estimate from the comment is a Property Specific Request presented as part of the process for establishing the General Plan and not applicable to the Project.

I37-61



COMMENTS

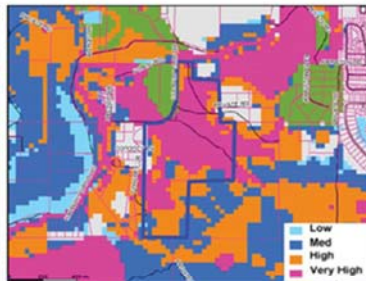
RESPONSES

PROPERTY SPECIFIC REQUEST **Comment Letter I37**

SD7 (cont.)



Steep Slope (Greater than 25%)



Habitat Evaluation Model



Agricultural Lands



Fire Hazard Severity Zones

Discussion (cont.)

Nearly one-half of the property is constrained by steep slopes, is nearly entirely constrained by High and Very High Habitat Value, and within the Very High Fire Hazard Severity Zone. The VR2 designation is not supported by the Elfin Forest / Harmony Grove Town Council or the San Dieguito CPG. In addition, the property is outside the Harmony Grove Village boundary proposed in the San Dieguito Community Plan. This Village boundary is the result of several public workshops that developed a compromise position to assign additional density within the Village boundary surrounded by Semi-Rural and Rural Lands. The Harmony Grove Town Council and the San Dieguito CPG support the PCC / Staff Recommendation, which proposes a combination of SR2, SR4, and RL20 designation. Under this recommendation, the SR2 designation is applied to the area adjacent to the Harmony Grove Village where there is less steep slope. The RL20 designation is applied in the southern portion where there is the most steep slope and SR4 to the remaining areas. The applicant is requesting a compromise position of Semi-Rural 0.5, which would be the same base density, but would result in fewer units because of the slope restrictions. The following is an estimate of the potential dwelling unit yield under each of the alternatives:

- Existing General Plan — 20 - 27 units
- PC / Staff Recommendation — 22 - 26 units
- Referral Map — 214 units
- Property Owner's request (SR0.5) — 168 - 180 units

SAN DIEGUITO [ELFIN FOREST - HARMONY GROVE]

I37-61