

COMMENTS	RESPONSES
<p style="text-align: center;"><b>Comment Letter I22</b></p> <p>June 20, 2017</p> <p>Ms Ashley Smith Land Use &amp; Environmental Planner 5510 Overland Avenue, Suite 310 San Diego, CA 92123 <a href="mailto:Ashley.Smith2@sdcounty.ca.gov">Ashley.Smith2@sdcounty.ca.gov</a></p> <p>Re: Harmony Grove Village South Draft Environmental Impact Report (PDS2015-GPA-15-002; PDS2015-SP-15-002; PDS2015-TM-5600; PDS2015-REZ-15-003; PDS2015-MUP-15-008; PDS2015-ER-15-08-006.)</p> <p>Dear Ms Smith,</p> <p>Thank you for the opportunity to provide comments on Harmony Grove Village South proposal put forth by the Kovach Group and RCS Partners.</p> <p>I'm a resident of a rural community east of the proposed project site, and sole owner of parcel 235-032-64-00 @ 2395 Johnston Road, Escondido, CA 92029.</p> <p>I would like to bring your attention to a couple critical and serious shortcomings of the project.</p> <p><u>Fire Protection Plan</u> <u>Access and Roads – Availability of Alternate Evacuation Route, pg 38 of DEIR</u> The term "road" is a misrepresentation of the fact that it is actually a dirt trail. In its current state, it is very hazardous to drive on it. Due to recent rain, there are several ruts from the soil being washed away. In addition, several sections of the dirt trail have disappeared due to overgrown brush. One side of the dirt trail has a steep upslope while the other side has a steep downslope. The driver of any vehicle will not be able to discern the edge of the trail due to overgrown brush – which will most likely cause the vehicle to go over the edge and roll down the steep slope.</p> <p>I regularly run/hike on the easement trail. The vegetation on both sides of the trail is prime wild fire fuel, and could very easily trap people evacuating in their vehicles. This would result in a similar situation as the recent fire in Portugal where fleeing residents were trapped and burned in their vehicles.</p> <p>This trail intersects my private driveway, and if the trail is clogged with vehicles during evacuation then my family and I will be trapped in our home and would not be able to evacuate. So, the statement that <u>this road would be available for use to connect to</u></p>	<p><b>Response to Comment I22-1</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 I22-2</b> Your comment regarding Johnston Road's current condition is noted. The condition of the road was evaluated by the County, Rancho Santa Fe Fire Protection District (RSFFPD), the Project's Fire Consultants, and independent fire pre-planning consultants for its potential to be used as secondary access. The result of that analysis indicated that even if access easements could be obtained, improvements to Johnston Road would result in a useable access way that would not strictly conform to the Fire Code, and a modification to the County's roadway standards would need to be granted.</p> <p><b>Response to Comment I22-3</b> Please refer to Response to Comment I22-2 for discussion on Johnston Road. The comments regarding the inability to evacuate are speculative with no basis for the conclusions provided in the comment. In addition, these comments do not address the environmental analysis or adequacy of the EIR and therefore a response is not required.</p>

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<p style="text-align: right;"><b>Comment Letter I22</b></p> <p><u>Johnston Road in an emergency situation should Country Club Drive not be available</u> – puts my family and myself at tremendous risk of being trapped and not able to evacuate. I22-3</p> <p>The connector road to Johnston Road is narrow and not able to handle two-way traffic. If the evacuating vehicles clog up the connector, then the fire truck would not be able to access my house. I22-4</p> <p>In addition, there are several residents already living on Johnston Road and its secondary roads. The DEIR does not show any analysis of impact on Johnston Road due to the proposed project – in an emergency situation.</p> <p>I have included 5 pictures showing the easement trail in its current condition. I22-5</p> <p><u>Appendix C. Alternative Secondary Access Analysis</u> <u>Page 83 Alternative 4.</u></p> <p>[1] ‘Alternative 4 traverses an existing easement road’. The easement as recorded is for specific parcels only.</p> <p>[2] ‘.....leads to a roadway that has an IOD’. Please provide the document which states that the roadway has an IOD.</p> <p>[3] ‘...road is currently passable by vehicle’. As mentioned above and shown in the pictures, it is very hazardous to drive on the easement trail, and more so during an emergency evacuation situation.</p> <p>[4] Page 84 states that private property owners have been contacted about easement rights. However, I have not been approached regarding this issue. I22-6</p> <p>Thank you for taking the time to address my concerns.</p> <p>Sincerely, Kulbinder Bains 2395 Johnston Road, Escondido, CA 92029</p>	<p><b>Response to Comment I22-4</b> Please refer to Response to Comment I22-2 for discussion on Johnston Road. The Project does not propose using Johnston Road for wildfire emergency evacuation, although emergency personnel will direct travel as required during emergency events.</p> <p><b>Response to Comment I22-5</b> The inclusion of five photos along Johnston Road is noted.</p> <p><b>Response to Comment I22-6</b> The following responses are provided pertaining to Appendix C of the Project’s Fire Protection Plan (FPP):</p> <ol style="list-style-type: none"> <li>1) This comment is not in variance with the EIR as the information provided in the FPP indicates the road is an easement road. The comment further clarifies the type of easement.</li> <li>2) The existence of three Irrevocable Offer of Dedication (IOD) instruments on this roadway was determined by Project engineers as part of a records survey. The documents addressing these IODs have been entered into the record as document numbers 0606673, 138329, and 0013412 and are incorporated herein by reference.</li> <li>3) Please refer to Response to Comment I22-2 for information about Johnston Road.</li> <li>4) It is acknowledged that the commenter was not contacted. It is reiterated that only some property owners along Johnston Road were informally contacted about easement rights. Based on resident opposition and statement made to the Project Applicant regarding the possibility of gaining access easements, it was determined that property owners would not be willing to grant easement rights.</li> </ol>

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Picture 1 : Looking West. Private Drive and Easement Trail to connector to Johnston Road



Picture 2 : Looking East, where Easement trail joins Private Drive

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Picture 3: Looking North. Trail disappears in brush.



Picture 4: Looking North. Row of sand bags to prevent soil erosion. Trail disappears in brush. Trail is about 14' wide at location of the stake.

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Picture 5: Looking North and East. Sharp right hand turn. Very difficult to determine left edge of the trail.