



20223 Elfin Forest Road
Elfin Forest, CA 92029

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Rincon del Diablo Municipal Water District
1920 North Iris Lane
Escondido, CA 92026

October 13, 2012

Dear Mr. Whitmann,

The Elfin Forest Harmony Grove Town Council appreciates the opportunity to comment on the R1A Reservoir Recycled Water Conversion Project.

We have reviewed the Initial Study/Mitigated Negative Declaration and would like to clarify that much the area referenced in this document as "Escondido," is actually Harmony Grove; part of an unincorporated community that is located outside the scope of the City of Escondido boundary. It should be noted that the central portion of Harmony Grove that this project falls within had previously been proposed for annexation and industrialization, but was removed by the Local Agency Formation Commission (LAFCO) from the Escondido sphere of influence at the request of Harmony Grove residents.

The residents of Harmony Grove are very concerned about the potential impacts of the major construction required by the Rincon Del Diablo Municipal Water District's R1A Tank Conversion Project. Harmony Grove is a quiet, peaceful rural equestrian community with no major thoroughfares. Two-lane, back-country roads such as Harmony Grove, Koana Loa and Country Club are our residents' only way in and out of the community.

The noise, dust and traffic flow disruption caused by the construction activity required by this project will significantly impact our local residents. Mitigation measures, as outlined in the Environmental Checklist of the Initial Study/Mitigated Negative Declaration, are inadequate for our community.

Additional measures are requested as follows:

Noise:

1. This project is adjacent to numerous rural residences and across the street from an equestrian center, where adults and children ride horses. Any sudden, loud noises such as blasting could frighten the animals and endanger the riders. For safety reasons, adequate advance notice of any anticipated blasting or loud noises should be provided to the potentially affected residents.
2. Some residents' horses are stabled very close to the proposed roadway construction. Horses are prey animals and perceive unknown objects, noises and events around them as

threats. This project, with its construction noise and events, is likely to affect some of these horses very negatively. We request that Rincon del Diablo Municipal Water District work directly with residents whose horses are stabled adjacent to the roadway project area to mitigate their specific issues.

3. The Discussion area regarding mitigation measures A and D specifically states that, *"The construction would be adjacent to a residence for no more than two straight days."* This is a critical issue and, if violated, must result in mitigation for the adjacent residences.

Traffic:

1. Access to/from all residential and commercial properties must be maintained at all times.
2. Traffic flow on all roadways under construction must be maintained at all times. Alternating opposing traffic within one operational lane is acceptable when necessary. Closing both lanes of traffic on any given road on a regular basis would create an unwarranted disruption of residents' lives and is not acceptable at any time.
3. Construction impeding traffic in the roadway should begin after 8:00 a.m. and end by 5:00 p.m. so residents can get to and from work and school.

Additional concerns raised by residents that should be addressed are as follows:

1. The fencing of rural properties is very important and suitable temporary fencing should be provided if any existing fencing should need to be moved.
2. Care should be taken to ensure that native plants, animals, trees and/or residential landscaping are not affected by this construction. Our community is part of a diverse and endangered ecosystem which can be severely impacted by construction disturbances. Our oak trees, in particular, are highly sensitive to soil disturbance and compaction.
3. Because rural farm animals may ingest foreign objects, care should be taken that no construction materials or any materials brought in by the construction crew -- including water/soft drink bottles, food wrappers, etc, should be left on or near any rural property.
4. Care should be taken that sparks from grading rocky areas do not ignite dry grasses in the area.
5. Excessive storm water drainage and inadvertent displacement of large natural boulders are always a particular concern on a hillside. Adequate erosion control and fencing should be in place during and after construction, and bare ground should be re-vegetated with native plants as soon as possible.
6. Any damage to Harmony Heights Road and residential driveways caused by this project should be repaired and the roadways must be returned to the condition they were in prior to this construction.

We also request that the both the Elfin Forest Harmony Grove Town Council and the San Dieguito Planning Group, which now represents Harmony Grove and Eden Valley, be added to

your project distribution list so that we can communicate any changes to project plans and timelines to our community.

We thank you in advance for your efforts to work with the Elfin Forest Harmony Grove Community to minimize any disturbances to our rural lifestyle.

Best Regards,

A handwritten signature in dark ink, appearing to read 'JA Benjamin', with several overlapping loops and a long horizontal stroke extending to the right.

Jacqueline Arsivaud-Benjamin, Chair
Elfin Forest/Harmony Grove Town Council