


COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter I12</p> <p>Dear Ms. Smith:</p> <p>I OPPOSE the proposed changes to the General Plan 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.) for the following reasons:</p> <ul style="list-style-type: none"> <p>COMMUNITY CHARACTER: This project is not consistent with the character and nature of the Harmony Grove community. The project plops down a “mass of condos and multi-story dwellings” in an area surround by preserved open space, rare habitat, horse ranches, estate residences and semi-rural residential environments. In the recent past, our the Board of Supervisors have not approve spot development of condos that change the character of communities like Harmony Grove.</p> <p>Supervisor Jacob: Thank you Mr. Chairman. I would have to agree with the concerns that Supervisor Horn has expressed. It just seems to me that this is definitely out of character with the surrounding area and if these visuals represent what is planned, I have a couple See County transcripts file No. 16145.68892</p> <p>Supervisor Jacob: Mr. Chairman. That is all of the questions I have. I concur with Supervisor Horn. This is definitely – it is clear to me this is out of character for the area. If I had to vote up or down on it, I would have to vote against this project today. If there See County transcripts file No. 16145.68892</p> <p>This project will destroy the character and nature of the last of the few special places in San Diego County that all citizens can enjoy.</p> <p>DECREASED SAFETY AND INCREASED FIRE RISK : In the DEIR, the Fire Protection Plan waives a key requirement intended to protect the safety of both existing and new residents. The most egregious of these is a waiver of the 800 foot minimum dead end road requirement (503.1.3). The only mitigation acceptable for exceeding this requirement is providing secondary access (503.1.2). The FPP waives both requirements and fails to demonstrate appropriate mitigation to avoid putting lives in danger. There should be zero tolerance for granting exceptions and exemptions to the California Fire Code in a Very High Risk Fire Area. The entire population at risk in case of wildfire includes all of Eden Valley, Harmony Grove, Elfin Forest, Cielo and Mt. Israel residents who may be unable to access Harmony Grove Road from Via Ambiente in case of sudden mass evacuation like those we have experienced in the past. The EIR needs to evaluate and disclose impacts to the entire region, not just the 1400 feet of improved road contemplated in the EIR. A quote from Supervisor Slater-Price:</p> <p>1 </p>	<p>Response to Comment I12-1</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 community character pursuant to the requirement of the General Plan. Specific to the quotes, they pertain to an amendment to the Specific Plan for Rancho Cielo in the community of Rancho Santa Fe, and were excerpted from a September 26, 2012, Board of Supervisors meeting transcript. The comments are noted, but the bases for those conclusions do not apply to the Harmony Grove Village South (HGV South) Project. The context of the comments makes it clear that opponents to that amendment were focused on reliance on earlier EIR documents (1981 and 1984) completed prior to the 2011 General Plan update, proposed ridgeline development, the lack of Resource Protection Ordinance review, removal of commercial and associated uses (including possible park uses) from an approved locale and placing them on a more distant part of the overall development, and other issues such as the inclusion of steep retaining walls along curving roads without a specified sidewalk or path nearby to provide pedestrian separation from the road. Relative to community character, Supervisor comments were heavily focused on the fact that the prior project had been approved under older standards and that ridgeline development was not preferred within the County in accordance with current standards.</p> <p>Each of those issues differentiates that project from the Proposed Project. HGV South has its own current EIR and is not relying on an EIR prepared decades ago, analysis has been completed in accordance with the current General Plan, no amendments to an existing approved Specific Plan are proposed, no ridgeline development is proposed, and no high retaining walls are proposed along curving roads. Some of the specific items identified as problematic in the public comments (lack of a Resource Protection Study review, lack of design criteria in the Specific Plan, and lack of private and public view impacts analysis) are not relevant to the Proposed Project, which includes each of those elements.</p>

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<p style="text-align: center;">Comment Letter I12</p> <p>Supervisor Slater-Price: Thank you. Based on that last comment, I have to say, why is staff recommending it, but before we go into such a long thing, let me just go back to a couple of questions that have been raised. First of all, the fire issue, I've driven those roads and those roads if you had to do even a somewhat large evacuation are inadequate. I can tell you that. They are very narrow. They are very winding and some of them are not, at this present time, in really good repair. So that is number one. Number two, there See County transcripts file No. 16145.68892.</p> <p>The DEIR needs to evaluate and disclose impacts on the entire regional road infrastructure. Please see highlighted from SPA 3813 05-004</p> <p>III. CIRCULATION ELEMENT</p> <p>The Circulation Element of the County General Plan depicts corridors for public mobility and access which are planned to meet the needs of the existing and anticipated population of San Diego County. It is the intent of the Circulation Element to preserve a corridor uninhabited by any permanent structure for future road right-of-way for each and every road shown on the Circulation Element map.</p> <p>Although there is much debate on the circulation needs for the San Dieguito area, this Specific Plan will not be specifically impacted by future decisions on roads adjacent to this property.</p> <p>A. Road Network</p> <p>1. Del Dios Highway</p> <p>This road generally abuts the project on the south and southeast. Del Dios Highway is recently a two-lane, 40-foot wide paved road within 100 feet of right-of-way. Due to topographic limitations, it would be difficult to widen at this time. The 1983 Circulation Element designated Del Dios Highway as an 84-foot collector road. The Rancho Cielo Specific Plan supports the 1983 Circulation Element as it relates to this road.</p> <p>2. Harmony Grove Road</p> <p>This road abuts the project on the northeast. Current right-of-way is 101 feet with improvements ranging from 16 to 24 feet of paving. The 1983 Circulation Element designates Harmony Grove Road as an 84' collector road. Rancho Cielo proposes no major improvements along Harmony Grove. Additional dedication and improvement requirements will be determined by the County Department of Transportation.</p> <p>The County is currently processing a General Plan Amendment (GPA) that may downgrade the Circulation Element classification of Harmony Grove Road (and Elfin Forest Road). If approved, the GPA will downgrade these roads from four-lane Collectors to two or three lane roads.</p> <p style="text-align: center;">2 </p>	<p>As such, the comments are noted but do not pertain to the Proposed Project. It is also noted for informational purposes that the Rancho Cielo amendment was not denied, but was returned to staff for additional review. That review, which was completed in 2013, resulted in a re-hearing of the amendment in August 2013, at which the amendment was approved.</p> <p>Response to Comment I12-2</p> <p>As noted in Response to Comment I12-1, the Supervisor was discussing roads in Rancho Santa Fe pertinent to a different project. Her comments do not relate to the current analysis. Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I12-3</p> <p>Comment noted. Subchapter 2.2, <i>Transportation and Traffic</i>, of the EIR, analyzes impacts on road infrastructure using thresholds established by the County. A majority of the comment's text is copied from the Rancho Cielo Specific Area Plan. It predates consideration of the Project and is either not relevant to the Project due to the distance of the Rancho Cielo area from HGV South-affected road segments or does not deviate from the information presented in the EIR. No response is required.</p>

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<p style="text-align: right;">Comment Letter I12</p> <p>D. Circulation</p> <p>The external circulation system bordering Rancho Cielo is public. There are two major points at which the Rancho Cielo Development will access these roads. Del Dios Highway, which borders the property on the south and east, is the main thoroughfare which serves the property via Calle Ambiente. Elfin Forest/Harmony Grove Roads will serve as secondary access from the north. A third access, Mt. Israel Road will be used for emergencies only, with the exception of adjacent property owners other than Rancho Cielo Development Company that may have existing legal access as of December 18, 1996, including access to any gates which will be constructed across said easement.</p> <p>NO JUSTIFICATION FOR AMENDING THE CURRENT GP: The requirement for considering a General Plan Amendment is "any change requiring a GPA "should be reviewed to ensure that the change is in the public interest and would not be detrimental to public health, safety, and welfare." This project would definitely be detrimental to public health and safety in that it will result in entrapment of current residents in case of evacuation; further, it brings no "public interest" that we can discern since there apparently is low public appetite and demand for the dense housing across the street in Harmony Grove Village. If that development is way behind its sales projections, as it is, what is the public interest in granting an amendment to a carefully constructed General plan to allow yet more density?</p> <p>IN SUMMARY: This DEIR needs to be recirculated to fully disclose the true impacts to health and safety in case of wildfire, the analysis of which is starkly inadequate. The County should refuse to take any monies for the HGV fire station from developers unless they conform to the General Plan, to prevent even the appearance of quid pro quo in the granting of exemptions to the Fire Code in a Very High Fire risk Area.</p> <p>Most Eden Valley, Harmony Grove, Elfin Forest, Cielo and Mt. Israel residents are not opposed to reasonable, fully disclosed and safe growth, however the infrastructures in these communities are already at their maximum safety threshold, and in some cases beyond a safe limit as residence in these area have experience firsthand during past wildfires.</p> <p>Regards</p>  <p>David Radel 18394 Via Ambiente Rancho Santa Fe CA 92067</p> <p style="text-align: center;">3 </p>	<p>Response to Comment I12-4</p> <p>Please see the Global Responses to General Plan/Community Plan Amendments CEQA Impact Analysis and Project Consistency with General Plan Policy LU-1.4. Please also see the Global Response to Fire Adequacy of Evacuation and Access.</p> <p>Response to Comment I12-5</p> <p>These are conclusion comments. They do not raise specific issues regarding the content of the DEIR, but 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>