

COMMENTS

RESPONSES

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

Comment Letter O2



June 17, 2017

Ms. Ashley Smith
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Ashley.Smith2@sdcounty.ca.gov

RE: Harmony Grove Village South Draft Environmental Impact Report

Dear Ms. Smith:

Endangered Habitats League (EHL) appreciates the opportunity to comment on the DEIR for this proposed project. For reference, EHL is a long term stakeholder in County planning endeavors and served on the advisory committee for the 2011 General Plan.

As you know, the current General Plan accommodates the County's fair share of regional population growth and identifies towns and villages within whose boundaries the bulk of such growth will be accommodated. These boundaries were devised after extensive community input. In the case of Harmony Grove, the community accepted a new village core. But that village came with boundaries that also identified the locations for continued rural uses.

Without any showing that there is now a deficit in housing capacity, or that the project would alleviate a shortage of housing affordable to these with median incomes—the actual source of the region's housing shortage—this project proposes to nullify the village boundary of the General Plan. EHL opposes this change.

The DEIR's deficiencies are manifold, and documented in comments from the Elfin Forest Town Council. We incorporate these comments by reference. Among the deficiencies are General Plan and Community Plan inconsistency, violation of Land Use Policy 1.4, failure to use the proper baseline of existing conditions for analysis, fire safety, traffic, biological impacts, and greenhouse gas emissions.

We urge developers to help build out the current General Plan rather than undermine it by speculating on rural land. We furthermore urge the Department of Planning and Development Services to expeditiously complete Community Plans for all the towns and villages, a task woefully delayed. If trends continue, the current General Plan's sustainable vision for discrete towns and greenbelts could transform into the worst of both worlds—loss of rural lands as well as loss of higher density villages.

O2-1

O2-2

O2-3

O2-4

O2-5

Response to Comment O2-1

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.

Response to Comment O2-2

The comments regarding the current General Plan and Endangered Habitats League's (EHL's) opposition to amending the General Plan/Community Plan are noted. The County respectively disagrees with the comment that showing of a deficit in housing capacity or shortage of affordable housing is required in order to propose a General Plan/Community Plan amendment. The Regional Categories Map and Land Use Maps are graphic representations of the Land Use Framework and the related goals and policies of the General Plan (Chapter 3.)

The General Plan, on page 2-7, recognizes the need to accommodate future growth by planning and facilitating housing in existing and planned villages. The General Plan, on page 1-15, states that it is intended to be a dynamic document and there are numerous policies in the General Plan that accommodate planning for future growth, such as M-2.1 (require development projects to provide road improvements), M-3.1 (require development to dedicate right-of-way), S-3.1 (require development to be located to provide adequate defensibility), and COS-2.2 (requiring development to be sited in least biologically sensitive areas).

General Plan Policy LU-1.4 permits an expansion of existing or planned villages that are consistent with the community development model and meet the requirements set forth therein. Therefore, the language in the General Plan clearly allows for future amendments to the Land Use Map and Regional Categories Map. The project is amending the General Plan/Community Plan by expanding an existing Village and meets the criteria of Policy LU-1.4. Please see the Global Response to Project Consistency with General Plan Policy LU-1.4 for a thorough discussion on related topic.

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	<p>Response to Comment O2-3 The County disagrees that the EIR is deficient. The comment notes that the deficiencies are documented in the letter from the Elfin Forest Town Council.</p> <p>Please refer to Response to Comment Letters O3a through O3c, which provides specific responses to those letters.</p> <p>Response to Comment O2-4 The comment lists several general environmental issues and perceived deficiencies but does not provide any specifics as to how or why these items are deficient. Therefore, no specific response is possible. Each of the items noted, however, is subject to substantial discussion in the EIR. The Project’s relationship to the General Plan and Community Plan is addressed in detail in the FEIR Chapter 1.0, <i>Project Description, Location and Environmental Setting</i>, and Section 3.1.5, <i>Land Use and Planning</i>, which also includes detail as to Project consistency with Policy LU-1.4. Project baseline, and the reasons why it is the correct baseline, are detailed on pages 3.1.5-1 and -2. Fire safety is addressed in Section 3.1.3, <i>Hazards and Hazardous Materials</i> as well as Section 3.1.8, <i>Public Services</i>. Traffic is addressed in Subchapter 2.2, <i>Transportation/Traffic</i>; biological effects are detailed in Subchapter 2.3, <i>Biological Resources</i>; and greenhouse gas emissions are evaluated in Subchapter 2.7, <i>Greenhouse Gas Emissions</i>. Each of these topics is also cross-referenced within applicable portions of the Section 3.1.5, <i>Land Use and Planning</i>, discussions. Project design features relevant to each of these topics are presented in Table 1-2, <i>Project Design Features</i>, and both the features and mitigation measures, as applicable, are provided in Chapter 7.0, <i>List of Mitigation Measures and Design Features</i>. Each of these sections appropriately addresses the topics. Please also refer to Response to Comment Letters O3a through O3c for more information provided in response to specific comments provided by the Elfin Forest Town Council.</p> <p>Response to Comment O2-5 This comment does not raise an issue pertaining to the environmental analysis or adequacy of the EIR; therefore, no further response is warranted.</p>

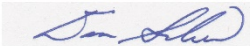
COMMENTS

RESPONSES

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Thank you for considering our comments.

Yours truly,



Dan Silver
Executive Director