

COMMENTS

RESPONSES

Dear Ms. Ehsan,

The following are my comments on the Valiano Specific Plan DEIR (PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2014-MUP-14-019, PDS2013-STP-13-003, PDS2013-ER-13-08-002)

General Plans need to be dynamic "to respond to changing community needs." In the case of Valiano, the applicant has stated that the "need" provoking this request for a GPA is more homes, closer to infrastructure, in accordance with smart growth principles. The current, updated General Plan (GP) has adequately addressed that need, and created a growth plan to meet the SANDAG estimated population with well-studied and minimal adverse impacts. That was the reason the entire Elfin Forest/Harmony Grove/Eden Valley community supported the 742-home Village CDM. The last review of the GP in the spring of 2015 found no change was necessary to meet projected population growth. There is no predicted housing shortage. Thus the particular changing community need provoking this GPA has not yet been established by any research-based evidence. The applicant should identify this need and provide appropriate supporting documentation.

The second requirement for a GPA is that the response must be in the public good. Traffic and fire safety evidence from this DEIR show this GPA will increase the risk of entrapment and death during fire evacuations and therefore significantly impair the public good. The applicant should establish how their response meets an identified community need while not endangering public health and safety.

Lastly, this GPA, if approved, will change the Harmony Grove Community Plan and require extensive revision of the existing conditions, vision statements, goals, issues, and policies; in effect, allowing the applicant to significantly and possibly adversely impact the future growth in the associated communities of Elfin Forest, Harmony Grove, and Eden Valley. Even restricting the Community Plan revisions to the Valiano specific plan area would set a precedent that would not only cause serious concern in Elfin Forest, but also significantly impair the degree of similarity in housing, attitudes, and interests that these two communities currently share. To protect its own Community Plan and critical rural interests, Elfin Forest may find it desirable to disassociate from Harmony Grove, its partner community since the inception of the Town Council in 1978. The impact of the dissolution of the long-term partnership of these two communities on the more economically disadvantaged Harmony Grove should be studied and mitigated.

I strongly advocate the consideration of an alternative project that would not impair the Community Plan of Harmony Grove, that is, build out neighborhood 5 with 1- and 2-acre lots on septic systems with horse-keeping privileges, as specified in the Harmony Grove Community Plan.

Sincerely,

Mid Hoppenrath  
2640 Harmony Heights Road, Harmony Grove, CA 92029

AT-1 See Responses K-110 regarding the Project location and M-18 regarding housing demand.

AT-2 See Response AF-20 regarding the Project evacuation analysis and expected increase in safety with new developments. See Topical Response: Fire/Evacuations for addition information. See Response M-18 regarding public benefit.

AT-3 See Response G-7 regarding Valiano's relationship with the Community Plan. The Valiano Specific Plan is closely related to several documents that will also have a bearing on development within the Plan area. The Plan area is within the jurisdiction of unincorporated San Diego County. The General Plan serves as the blueprint for future growth and development and establishes policies for lands located within the unincorporated areas of San Diego County. The County is the lead agency maintaining the General Plan and Community Plan policies. The Land Use Element of the General Plan describes Specific Plans as planning tools allowed for by State law that may be developed for areas of the County to provide more precise guidance for land development, infrastructure, amenities and resource conservation consistent with the use types and densities specified by the Land Use Designations and the goals and policies of the General Plan. The Valiano Specific Plan implements the goals and policies of the General Plan by providing development guidelines that reflect the unique opportunities and constraints of the Plan Area. While the Land Use Element (inclusive of Land Use Maps and Goals and Policies) applies to all lands throughout the unincorporated County, there are special land use issues and objectives that uniquely pertain to each of its diverse communities. These are addressed by Community Plans in which goals and policies are defined to provide more precise guidance regarding the character, land uses, and densities within each community planning area. The 48-acre southeastern portion of the Project site (future Neighborhood

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AT-3  
cont.

5) located north of Harmony Grove Village in Eden Valley is the only portion of the Project within the EFHGCP area. The County of San Diego is the lead agency maintaining the goals of the Harmony Grove portion of the EFHGCP and the Valiano Specific Plan's consistency with these goals. There is no need to dissolve the EFHGCP, and no need for extensive revisions to its vision statements, goals, issues, and policies. Please see Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis.

AT-4

The commenter's preference for adoption of an alternative project is hereby included as part of the record and made available to the decision makers prior to a final decision on the Proposed Project as part of this response. See Responses G-2, G-3, and I-29 regarding septic. See Topical Response: General Plan Amendment and Subarea Boundary Adjustment CEQA Analysis regarding lot size in Neighborhood 5 and consistency with EFHGCP policy LU-1.5.1 and horse-keeping lots in Neighborhood 5.