

## COMMENTS

## RESPONSES

### CREST/DEHESA/GRANITE HILLS/HARBISON CANYON

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By unanimous vote of the Crest/Dehesa/Granite Hills/Haribson Canyon Subregional Planning Group, we write to comment on what is a direct attack and attempt to subvert the extensive community based process of developing subregional community plans adopted and updated by the County as part of its overall General Plan.

While the specific matter of immediate consequence is a residential developer's attempt to avoid adopted community plan in the Harmony Grove/Eden Valley neighborhood via a proposed change to internal planning area boundaries that would allow it to develop to higher density, any change to a Planning or Sponsor Group's internal or external boundaries that is not originated by the affected Planning or Sponsor Group, by the County itself as part of a general realignment, or otherwise circumvents the normal community plan development and amendment process should not be allowed. It should be a prerequisite that any attempt to change a Planning or Sponsor Group's internal or external boundaries be initiated by or consented to by the affected Planning or Sponsor Group(s). If not a prerequisite, then, at a minimum, Planning and Sponsor Groups must be given an opportunity to evaluate and comment on any proposed change to the Group's internal or external boundaries and any such change should have to go through the same public process as required for an amendment or update to the community plan.

It is the consensus of the Crest/Dehesa/Granite Hills/Haribson Canyon Subregional Planning Group that:

1) developments should conform to the approved existing Plans that are the result of community process and public vote;

2) any revisions of approved existing Plans should likewise require community process and public vote; and

R-H-1 Introductory comment noted. Please see responses to specific comments, below.

R-H-2 The comment claims that changes to planning area boundaries should not be allowed. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis and Response R-G-36 regarding the importance of the local voice and rights of private property owners.

R-H-3 Comment noted. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis. Consistent with the comment, Planning and Sponsor groups have been given an opportunity to evaluate and comment on the proposed change exactly the same as the amendment process. The Recirculated Draft EIR provided the opportunity for comment and input similar to the General Plan Amendment comment period provided during the initial Draft EIR circulation. Also similarly, the San Dieguito Planning Group will continue to provide input on the Project as desired. All of this information is part of the record considered by County staff during their recommendations to the Planning Commission and Board of Supervisors, and considered by the Planning Commission and Board of Supervisors during their consideration of the Project.

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- R-H-4 Comment noted. It is understood that there is a preference for exact conformance to an approved document by the Planning Group. Please see Topical Response: General Plan Amendment and Subarea Boundary Line Adjustment CEQA Analysis for a discussion of the Project's conformity to the General Plan and SDCP policies, as well as a discussion about the need for revisions to applicable land use plans and the County's authority to make such changes. As part of the planning process, California law allows private property owners to propose uses of their property that vary from projections in an existing plan in a discretionary application. The decision-maker must consider the proposal with appropriate engineering, design and environmental review, and cannot deny it strictly on the basis of a requested plan amendment. The applicant seeks a consistent set of planning rules to apply to its entire Specific Plan Project, and not a separate set of rules for just Neighborhood 5.
- R-H-5 Please see Responses R-H-3 and R-H-4 regarding community process. The Planning Group's opinion that any revision to an approved plan require also should require a public vote is noted. Revisions to Community Plans, however, are within the purview of the Board of Supervisors and do not require public vote.

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R-H-6

3) the Planning Group is opposed to a developer circumventing the public process and participation, by means of a privately-initiated General Plan Amendment to alter the existing, approved Community Plan.

R-H-7

Accordingly, the Crest/Dehesa/Granite Hills/Harbison Canyon Subregional Planning Group opposes the proposed changes to the Harmony Grove Community Plan proposed as part of the Valiano Project on grounds it subverts the public process that led to the community plan in the first place. On the broader level, it is the Group's consensus as enumerated above, that community process and public vote must determine the boundaries of Community Plans.

  
Wally Riggs, Chair  
Crest/Dehesa/Harbison Canyon/Granite Hills  
Subregional Planning Group

Cc:

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R-H-6

Comment noted. As described in Response R-H-3, the developer is not circumventing the public process and participation. Documentation of the public comment/participation in the evaluation of the proposed amendment is provided by the comments received on this topic in response to the Recirculated Draft EIR.

R-H-7

The comment states that changes to planning boundaries should be done by community process and public vote. Please see Responses R-H-3 through R-H-6.