



Dedicated to a continuing rural atmosphere

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August 30, 2010

RE: NOTICE OF PREPARATION OF A PROGRAM EIR FOR A GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN. City Case #: PHG 09-0020, PHG 10-0016

The Elfin Forest Harmony Grove Town Council thanks you for the opportunity to comment on this NOP for the program EIR for the City's General Plan Update and Climate Action Plan. In particular we have comments on General Plan Amendment Study Areas EL-5 (Eden Valley) and EL-6 (Harmony Grove) and the proposal to re-plan and rezone these areas to Industrial Office and Specific Planning Area in the proposed Escondido General Plan Update.

The residents of Eden Valley, Harmony Grove and Elfin Forest, are in the final stages of a long laborious consensus-building planning process with the County of San Diego to develop a vision for our communities as part of the San Diego County General Plan Update. It is especially because of this planning process that we have very specific comments about the City of Escondido's proposed General Plan Update.

HARMONY GROVE

Elfin Forest and Harmony Grove residents prepared the "Draft Elfin Forest and Harmony Grove San Dieguito Community Plan" as part of the County's General Plan Update planning process. It is anticipated that our Community Plan along with the entire County General Plan Update will be adopted by the County Board of Supervisors later this fall. Specifically, Harmony Grove's vision as is reflected in our new Community Plan, page 33, is as follows:

(http://www.sdcounty.ca.gov/dplu/gpupdate/docs/draftgp/complan/sandieguito_efhg_070109.pdf)

"The area is rural in nature, extremely quiet, peaceful, and generally remains in its natural state except for the agricultural uses. The dark night sky is an important aesthetic resource. The most scenic views in Harmony Grove are of the hills, valleys, riparian habitat, and grazing farm animals and these visual qualities must be preserved. The area remains non-industrial with low-densities that preserve the community's historic rural agricultural character.

The residents embrace a green community where they continue their rural small-town lifestyle, enjoy keeping leisure and market animals, and live in harmony with the land and the wildlife. The Village is a place where local farmers sell organically grown vegetables and where residents' children often find first homes or where their parents can choose to live in retirement.

The historic rural habitat is preserved where the Village is surrounded by large-lot rural homes and small, family owned farms and vineyards that preserve the critical relationships necessary for this environmentally sensitive and balanced green community. The all-important rural voice is not overwhelmed by the urban voice."

Harmony Grove strongly supports conservation and protection of native species, and is working towards becoming a model green community by recycling animal wastes, using reclaimed water for irrigation, and supporting local organic agriculture. Agricultural uses, especially small family-owned organic farms, are important to the functioning of Harmony Grove and are encouraged as part of an environmentally sensitive community plan. We are working with the County to establish policies and zoning that would maintain an attractive rural neighborhood that encourages responsible animal keeping. There is a range of housing planned to accommodate residents through all stages of life.

In particular, the EL-6 General Plan Amendment Study Area impacts the community of Harmony Grove. To designate this area as industrial as is suggested in this NOP could cause significant adverse impacts to our community and prevent the realization of the residents' vision as detailed in our Draft Community Plan. The negative impacts include:

- Encouragement of urban sprawl development that encroaches on the remaining historic rural community and increases both vehicle miles traveled and greenhouse gas emissions
- Significant safety hazards from truck and commuter traffic
- Degradation of air quality associated with increasing density and intensive land uses
- Fragmentation of historic rural neighborhoods
- Degradation of the lifestyle in the rural agricultural communities, with attendant loss of property values of the rural home sites
- Loss of land for agricultural and equestrian business opportunities, which are specifically encouraged in the Elfin Forest and Harmony Grove Community Plan
- Removal of protection of land with significant physical or environmental constraints or hazards: ridgelines and possible disruption of wildlife corridors along Escondido Creek
- Loss of open space and natural resources
- Degradation of aesthetics and scenic views in the valley

Even though the proposed EL-6 has many potential negative impacts to Harmony Grove, this area of Harmony Grove has already been negatively impacted by previous Escondido developments that were not sufficiently buffered. Because of this there are some existing rural home owners in the EL-6 area who may wish to sell their properties and leave the area because it is no longer a desirable place to live. Therefore this small portion of Harmony Grove may be appropriate to be replanned and zoned to industrial. However this should only occur if, consideration is given as to how to preserve the Harmony Grove community character and retain rural property values while accommodating this limited industrial use.

Therefore, the Escondido General Plan Update and EIR should:

1. Recognize and support the new proposed Elfin Forest and Harmony Grove Community Plan already proposed for these communities.
2. Extend the Escondido General Plan study area to include all of Harmony Grove, so that through the General Plan Update process the City has the ability to include and support the Harmony Grove Community Plan.
3. Recommend that the new General Plan accept and adopt all of the provisions which exist in the Harmony Grove portion of the Elfin Forest and Harmony Grove Community Plan. This should include an agricultural/equestrian district overlay that would allow durable special animal and livestock keeping, breeding, and boarding privileges, a trail system suitable for equestrian use and low density zoning to encourage small family-owned organic farms.

4. Consider and develop a plan for a sufficient buffer area between the adjacent future industrial/commercial uses in EL-6 and the existing rural residential uses. This buffer area should be structural as well as visual, in the sense that

industrial truck traffic and high-speed commuter routes, which cause significant adverse impacts in rural residential/equestrian areas, would not be allowed to enter into or negatively impact Harmony Grove.

5. Review and draft policies in the new General Plan that will require that if the parcels in EL-6 are annexed into the City of Escondido that the City will commit to restore to its natural state the Escondido Creek that runs through this area.

5. Respect the Circulation Element of the proposed San Diego County General Plan which commits to maintain all the roadways in Harmony Grove and Elfin Forest as narrow low-speed roads. In no case should any truck traffic or commuter traffic increase the level of service on our rural roads.

6. Finally, we request that the City of Escondido seek the approval of the San Dieguito Planning Group (which is anticipated to be the representative planning group for Harmony Grove by 2011) before proceeding to annex any of parcels in EL-6.

EDEN VALLEY

While the Elfin Forest/Harmony Grove Town Council does not represent the community of Eden Valley, we have heard from a number of Eden Valley residents that they have similar concerns about General Plan Amendment Study Area EL-5. Since they are a neighboring community who shares similar beliefs about their rural lifestyle, we urge you to also consider that the proposed San Diego County General Plan be respected in their community also...

We hope that the City of Escondido will realize the benefit of working with us, your neighbors, and helping all of us, preserve our wonderful rural community.

Sincerely,

Melanie Fallon, Chair
Elfin Forest Harmony Grove Town Council

cc:
Supervisor Bill Horn, San Diego County Board of Supervisors,
San Diego County Board of Supervisors
San Dieguito Planning Group
Devon Muto, DPLU, County of San Diego
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