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Garth Koller, Principal Planner
City of San Marcos
Development Services Department
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San Marcos, CA 92069
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August 4, 2011

RE: Notice of Preparation of Draft Environmental Impact Report on the City of San Marcos General Plan and Zoning Ordinance Update

Dear Mr. Koller,

The Elfin Forest/Harmony Grove Town Council thanks you for the opportunity to comment on the scope of the information to be included and analyzed in the Environmental Impact Report (EIR) on the City of San Marcos General Plan and Zoning Ordinance Update.

Our comments mainly focus on the Land Use and Planning issues in the General Plan and EIR. As you may know the residents of Elfin Forest and Harmony Grove have just completed a 12 year planning process with the County of San Diego and within the next few weeks we anticipate that the Board of Supervisors will approve the County's new General Plan and along with it the new Elfin Forest/Harmony Grove Community Plan. As part of the analysis to be done to prepare your EIR, you must refer to this new Community Plan, which is located at

http://www.sdcounty.ca.gov/dplu/gpupdate/docs/bos_oct2010/B2.17a_ef.hg.cp_102010.pdf

As you know, we are two very cohesive communities where all of our residents work hard to ensure that we maintain our rural lifestyle, and you will find that our new Community Plan outlines many goals and policies that ensure the continuation of our rural way of life. That being said we do applaud San Marcos' goal in your new General Plan that you become a "vibrant destination city" and I am sure that you must know that many of our residents

utilize the city services that San Marcos offers and we look forward to your future which will include a new and exciting downtown.

Our major concern has to do with the fact that you have included part of our community as a planning area in your new General Plan. We refer to this property as University Heights. It is located in the center south portion of your planning map, Figure 2, San Marcos City Limits and Planning Area, south of San Elijo Road and east of Questhaven Road. This property has already been analyzed extensively as part of the General Plan Update process in the context of the rest of the County, zoned for Rural Lands 20 (RL20), and we have no desire to go through another planning process. Please find below the County staff rationale for the zoning adopted as part of the San Diego County General Plan on August 3, 2011:

REF #	PROPERTY	EXISTING GENERAL PLAN	GP2020 WORKING COPY	REQUEST	CPG/CSG POSITION	STAFF RECOMMENDATION AND RATIONALE
62	<p><i>Harlan Lowe</i></p> <p>Located in the Elfin Forest community.</p> <ul style="list-style-type: none"> Rural Lands category <p>APNs: 222-130-06, 13 222-122-06, 08 to 10</p>	1 du/ 4,8,20 acres	1 du/20 acres and 1 du/40 acres	2 acre minimum lots	Retain Working Copy designa- tions	<p><i>personal property</i></p> <p>DISAGREE - Retain 1 du/ 20 acres</p> <ul style="list-style-type: none"> Located in the Elfin Forest community within the San Dieguito CPA Adjacent to the City of San Marcos and to the higher density San Elijo Hills area Properties form an area of large, contiguous, undeveloped lands critical to the corridor and to the maintenance of local character Much of these properties are extremely steep, containing 25-50% slope with some 50-75% slope Lower density also provides community separation from the high densities in the City of San Marcos

REF	PROPERTY	DENSITY RECOMMENDATIONS	STAFF RATIONALE
62	<p><i>Harlan Lowe</i></p> <p>Inside CWA boundary. Elfin Forest Community.</p> <ul style="list-style-type: none"> 453 acres Existing General Plan: 1 du/4,8,20 acres 	<p><i>GP2020 Working Copy:</i> Rural Lands: 1 du/20 acres</p> <p><i>Referral Request:</i> Semi-Rural: 1 du/2 acres</p> <p><i>CPG/CSG:</i> Rural Lands: 1 du/20 acres</p> <p><i>Planning Commission:</i> Staff Recommendation</p>	<p><i>County Staff:</i> DISAGREE with request Retain Rural Lands: 1 du/20 acres</p> <ul style="list-style-type: none"> Develop a legally defensible general plan – remain consistent with treatment of other Semi-Rural areas Reduce public costs – limited County roads and infrastructure in the Elfin Forest area Assign densities based on characteristics of the land <ul style="list-style-type: none"> Area has very steep slopes and high biological sensitivity This undeveloped area is critical to maintenance of the wildlife core area Create a model for community development – Rural Lands designation is consistent with GP2020 planning concepts to provide a buffer of low density development between the community and the City of San Marcos

In addition our new Community Plan also has a goal that is embedded in the new County General Plan, which is that there shall be no more annexation by any surrounding cities of any of the Elfin Forest or Harmony Grove communities:

Goal LU-2.1 Preservation of the rural unincorporated community of Elfin Forest and its cohesiveness with its neighbor, the rural unincorporated community of Harmony Grove.

Policy LU-2.1.1 Coordinate with LAFCO to respect the boundaries of the unincorporated community of Elfin Forest and Harmony Grove and strongly discourage any portion to be annexed to adjacent cities.

Especially since this is not an area where the property owner initiated planning of this area, we respectfully request that you eliminate this area from your consideration in the preparation of your new General Plan.

We look forward to working with you on this EIR and the new General Plan. Our contact person for this project is Melanie Fallon who can be reached primarily through email at mfallon1@att.net or at [760.744.7090](tel:760.744.7090). We understand that you have a General Plan Advisory Committee and if it is possible we think that it may be appropriate to include Ms. Fallon on this committee or at least keep her apprised of meetings and other important dates and information.

Thank you for the opportunity to comment on this process and we look forward to your response to our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'JA', with several loops and a long horizontal stroke extending to the right.

Jacqueline Arsivaud-Benjamin, Chair
Elfin Forest/Harmony Grove Town Council

cc:

San Diego County Supervisor Bill Horn
Devon Muto, Manager San Diego County Dept of Planning and Land Use
Eric Lardy, Director, DPLU
Steve Barker, President, The Escondido Creek Conservancy
Chief Frank Twohy, Elfin Forest/Harmony Grove Fire Department