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20223 Elfin Forest Rd., Elfin Forest, CA 92029

Members of the Board of Supervisors
County of San Diego
County Administration Center
1600 Pacific Highway
San Diego, CA 92101

October 5, 2010

Dear Members of the Board of Supervisors;

The Elfin Forest/Harmony Grove Town Council (EFHGTC) appreciates the opportunity to comment on the draft General Plan.

Our community has worked very hard over a number of years to prepare and draft the Elfin Forest and Harmony Grove Community Plan. In our small community of just over 700 homes, we had more than 70 residents review and comment on our Plan during its preparation, which is not uncommon in our community-oriented valley. We have an extremely strong community spirit that focuses on the preservation of Elfin Forest and Harmony Grove as rural communities, and preserving and defending the area's sensitive environmental habitat. It is with this background that we submit this letter to you.

But, before we go any further, we want to compliment your fine staff. They have been extremely helpful and always pleasant and professional. Your staff and consultants have done an admirable job in bringing this important document to this critical point in its completion. Our community, as I am sure every other community in this County, is anxiously awaiting the final approval of the County's new General Plan. I know we could not have gotten to this point without the staff direction and dedication.

While we are very proud of our draft community plan and support the General Plan Update, we are concerned about one major factor in this process and that is which land use plan will be adopted for our community. We strongly support the staff's Draft Land Use Map and the Planning Commission recommendations with one exception (SD11), which will be covered later in this letter, but we are *extremely concerned* about the Referral Map recommendations and their potential impact upon our community. These concerns are outlined below.

The Referral Map depicts higher densities in three specific areas in Elfin Forest (SD2, SD4, SD6, and SD8) that are in conflict with our draft Community Plan. The Referral Map also allows unacceptably high densities in the semi-rural and rural areas surrounding the Harmony Grove Village Specific Plan Area (SD1, SD7 and SD8). These densities do not meet the goals of the

new Community Plan, which is the plan envisioned by the community after years of planning with DPLU staff and New Urban West to develop the new Harmony Grove Specific Plan, which implements the Village Development Pattern.

Furthermore, review of the Referral Map density recommendation demonstrates that far from “protecting property rights”, as the rationale for ignoring years of joint planning effort and simply acceding to land owner wishes without any view to the impact on the rest of the community, and the County as a whole, at least two of the more egregious “referrals” in our community in fact represent a “gift” to the land owners way beyond their current entitlements. As will be shown below, the referral map would *increase* the density on these parcels versus current GP by almost by a factor of four to five in both cases. The “property rights” of the surrounding current land owners and residents would thus be trampled, but should be taken into account: when a community like ours shown as 750 residences in 2004 takes a 176% increase in units and population to about 2,100 under the Referral map, what will happen to the quality of life, and therefore the property values, of these existing property owners? Should the years of careful planning and the wrenching choices the community has made to accept its share of growth with a *doubling* of units with the Harmony Grove Village project be tossed aside for the sake of two large developers trying to skirt the entitlement process?

The following matrix outlines the different land use recommendations for these key areas.

ELFIN FOREST/HARMONY GROVE COMMUNITY PLAN RECOMMENDATIONS

<u>ID</u>	<u>REF NAME</u>	<u>CURRENT GP</u>	<u>REF MAP</u>	<u>PLNG COMM</u>	<u>EFHGTC</u>
SD1	#65 S. Anderson	1 du/ 4, 8, 20 ac	SR4	SR10, RL20	SR10, RL20
This property is environmentally sensitive and it is located to the west of and adjacent to the Harmony Grove Village Specific Plan (HGVSP) area. The commitment to the community at the time of the New Urban West SPA was that we would agree to increased density at Harmony Grove Village, in exchange for the rest of the Harmony Grove community retaining its rural character, in keeping with the Village Development Pattern, That is why the SR10 and RL20 designations are critical.					
SD2	#61 E. Anderson	1 du/ 2, 4 ac	SR2	SR4	SR4
At SR4 this property would be consistent with the rest of the Elfin Forest community; however the adjacent properties to the south and east are currently 1 du/2. The areas to the north and west have been purchased by the county in the area known as Sage Hill. .					
SD3	Now Sage Hill	1 du/ 2, 4 ac	SR2, SR4	Open Space	Open Space
SD4	#63 Burns	1 du/ 2, 4 ac	SR2	RL20	RL20
This is environmentally sensitive land surrounded by other RL20 land. (Questhaven Retreat.) Therefore RL20 is the appropriate land use.					
SD6	#55 Tan	1 du/ 2, 4 ac	SR2	SR4, RL20	SR4, RL20
Part of this property that is in the PC recommended RL20 designation is environmentally sensitive land and is adjacent to the new Sage Hill Reserve, so RL20 should be its logical designation. The other half of the property is contiguous to the Elfin Forest residential community which is being proposed to be SR4 and therefore this portion should also be designated at SR4 and not SR2.					
SD7	Harmony Grove Meadows	1 du/ 4, 8, 20 ac	SR2, VR2 RL20	SR2, SR4 RL20	SR2, SR4, RL20
This property is approximately 120 acres and the Referral Map would allow 200+ housing units on the property, instead of the less than fifty under the current General Plan. This is the very property the community believed would stay rural when we agreed as a community to 742 homes with Harmony Grove Village. The Planning Commission recommendation (which was unanimous) is critical to the community.					

SD8	University Heights	1 du/ 4, 8, 20 ac	VR2, SR1 SR2, SR4 RL20	RL20	RL20
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This is a 400+ acre property located in the heart of Elfin Forest and Harmony Grove and it is adjacent to the 600 acres of open space of the Questhaven Retreat. The land is comprised of extremely steep slopes and has environmentally sensitive habitat on it. The Planning Commission and the Town Council advocate a low rural density on this property to protect the environment and respect the rural character of our two communities.

SD11	Bridges Unit 7	1 du/ 2, 4 ac	SR2	SR2	SR4
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The Town Council continues to believe that this property should be designated as SR4 instead of SR2 because it is environmentally sensitive land. It contains the most critical habitat of any open space left in Elfin Forest – it is located in the very core of the gnatcatcher breeding grounds, which is why Lennar Homes has withdrawn its application to develop this land and is entertaining a sale of the property for conservation purposes. Until that happens, it should be planned as SR4 which was the Environmentally Superior recommendation by DPLU.

Of the properties outlined above, we have the most concern about SD7, SD8 and SD11.

SD7 is known as the Harmony Grove Meadows property. The densities proposed in the Referral Map (SR2, VR2, RL20) could allow somewhere in the vicinity of 200 to 250 units on this property, which is dramatically greater than what is allowed by the **current** General Plan (1 du/ 4, 8, 20 acres) which would yield somewhere in the vicinity of 40 to 50 total units. The Referral Map recommendation as such represent a severe density increase over the existing General Plan, and violates the understanding the community had with County staff that in exchange for agreeing to add 742 units in the Harmony Grove Village SPA, the rest of the valley would retain its current density or lower. The Referral map recommendation is not consistent with the lower level of development, which should transition away from the Village Center, in accordance with the principles of the Village Development Pattern. The Planning Commission, DPLU staff and the Elfin Forest and Harmony Grove communities support the SR2, SR4, RL20 recommendation for this property. It would allow approximately 25 to 30 units on this 120 acre property which is the correct density on this property given the topography.

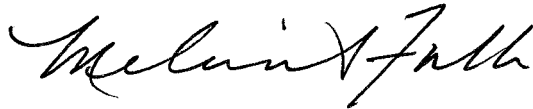
SD8 is known as the University Heights property. On this property also, the Referral Map would allow a much higher density up to 250 units (VR2, SR1, SR2, SR4, RL20) than what is allowed in the **current** General Plan of less than 50 units (1 du/ 4, 8, 20 acres) This property contains extremely steep slopes and sensitive biological resources. It has also been the subject of a possible request for annexation to the City of San Marcos. Our community is very much concerned because any development at the density proposed by the Referral Map (and plans from the developer for up to 1,200 homes) would physically divide our community in half and allow much more development than is appropriate for the environmental sensitivity of the land.

SD11 is known as Lennar’s Bridges Unit 7 property. The community continues to believe that this property should be designated SR4 even though the Referral Map, the Draft Land Use Map and the Planning Commission are recommending that this property be designated SR2. Lennar Homes has withdrawn its application to develop this land and is entertaining a sale of the property for conservation purposes. This property contains the most critical habitat of any open space left in Elfin Forest and is located in the very core of the California gnatcatcher area since it contains extremely sensitive environmental habitat for coastal sage scrub. Until such time as this land has been purchased for conservation purposes, we believe

that the recommendation reflected in the Environmental Sensitive Map of SR4 should be adopted to protect this property.

Thank you for this opportunity to comment on the County's new General Plan and our Community Plan. We urge the Supervisors to vote for the Draft Land Use Map and to reject the affront to good planning and smart growth that the Referral Map represents. It is an exciting time for the County to be on the eve of finally completing the revisions to this important document and we appreciate having been given a voice in its creation.

Sincerely,

A handwritten signature in black ink, appearing to read "Melanie Fallon". The signature is written in a cursive, flowing style.

Melanie Fallon, Chair
Elfin Forest/Harmony Grove Town Council

Cc:
Board Offices
Clerk of the Board
San Dieguito Planning Group
Robert Citrano
Eric Gibson
Eric Lardy
Devon Muto
Chandra Wallar