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20223 Elfin Forest Rd., Elfin Forest, CA 92029

Friday, January 16, 2009

County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Dear Devon Muto,

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

Land Use Maps Appendix

In the Land Use Maps Appendix, the EFHGTC strongly opposes the San Dieguito Land Use Map, Figure LU-A-20 (*page 36*). In Harmony Grove it allows unacceptably high densities in the semi-rural and rural areas surrounding the Specific Plan Area known as Harmony Grove (SD1, SD7 and SD8.) These densities do not meet the plan as envisioned by the community after years of planning with the DPLU staff and New Urban West. This is not the map that is shown in the Harmony Grove Community Map, which was submitted to the County in October, 2008, and has been approved by the Elfin Forest Harmony Grove Town Council and the San Dieguito Planning Group.

In the Elfin Forest community the San Dieguito Land Use Map also depicts higher densities in areas that are in conflict with the draft Elfin Forest Community Plan and the Draft Land Use Map. (SD 2, SD4, SD-6 and SD8.) In addition, these densities are in direct conflict with the County goals LU 2-1, LU 5-3, LU 6-8, and LU 7-1.

As we stated in both the Elfin Forest Community Plan and the Harmony Grove Community Plan, the Elfin Forest/Harmony Grove Town Council supports the Draft Land Use Map instead of the Proposed Project Referral Map. The Draft Land Use Map accurately depicts the future development potential of our communities as defined in the County's Draft General Plan and the Draft Elfin Forest Community Plan and Draft Harmony Grove Community Plan.

In addition, the General Plan Update land use map is lowering the densities on much of the property within both Elfin Forest and Harmony Grove (for example from SR-2 to SR-4.) While we support this change in density, many residents have expressed a concern that they may not be able to add-on or expand their existing homes that were built to the plan (for example

designation of SR-2), or to rebuild after a wildfire, because the Building Department would consider their properties to be non-conforming once the new General Plan is adopted. Can you please clarify this issue so we can put the residents' fears to rest?

Land Use Section

In Section 3: Land Use Element, Purpose and Scope, Community Plans, *page 3-3*, there is no mention of the Harmony Grove Community or the Harmony Grove Community Plan, although it was originally submitted to the county in 2001, and was recently re-submitted to the county in October of 2008. Please add our community to the list.

In Section 3, on *page 3-9*, we agree with the County's assessment of the benefit of rural land, which, as noted, does all of the following:

- Preserving the County's rural atmosphere
- Protecting land with significant physical or environmental constraints or hazards
- Preserving open space, farmland, and natural resources
- Providing open space buffers and a visual separation between communities
- Preserving and providing land for agricultural opportunities
- Preventing sprawl development, which reduces vehicle miles traveled and greenhouse gas emissions

In Land Use Goals, we support Goal LU-2, Maintenance of the County's rural character, especially LU-2.1, which maintains Community Plans to guide development to reflect the character and visions for each individual unincorporated community.

In Land Use Goals, we support Goal LU-4, Inter-jurisdictional Coordination, especially LU-4.5, which opposes annexations by neighboring cities that would result in land uses incompatible with unincorporated lands.

In Land Use Goals, we support Goal LU-5.3, Rural Land Preservation, which will preserve existing undeveloped and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) that provide carbon sequestration benefits.

In Land Use Goals, we support Goal LU-6.1, Environmental Sustainability, which supports the protection of critical and sensitive natural resources and the long-term sustainability of the natural environment. We support Goal LU-6.2, Reducing Development Pressures, which assigns low-density or low-intensity land use designations to areas with sensitive natural resources. We support Goal LU-6.8, Development Conformance with Topography, which requires development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying storm water to the maximum extent practicable.

In Land Use Goals, we support Goal LU-7.1, Agricultural Land Development, which protects agricultural lands with lower-density land use designations that support continued agricultural operations.

In Land Use Goals, we support Goal LU-10, Residential Connectivity which requires residential development in Semi-Rural and Rural areas to be integrated with existing neighborhoods by providing connected and continuous street, pathway/trail, and recreational open space networks. We support LU-10.2, Development–Environmental Resource Relationship, which requires development in Semi-Rural and Rural areas to conserve the unique natural features, preserve rural character, and avoid sensitive environmental resources and natural hazard areas.

Housing Element

We disagree with the proposed clustering policy for rural areas stated in the following sentences: “In areas without access to sewer, major new developments will continue to rely on single-family units but should utilize clustering and small lots to reduce land and infrastructure costs. Also the permitted use of mobile/manufactured homes affords lower single-family prices in these rural areas.” (*page 6-10*) We believe that large lot, single family homes and small farms will best reflect the character of our rural area and allow for the continuation of the rural lifestyle, as mandated by goals LU-2, Maintenance of the County’s rural character and LU-10.2, Development–Environmental Resource Relationship, among others. Clustering is best left to urban and suburban areas. We believe this approach is more compatible with the policy stated on *page 6-11*: “Development should be compatible in bulk, style, and scale with the character of its surroundings while still meeting the needs of its residents.”

San Dieguito Mobility Element Network

In the Mobility Element Network—San Dieguito Community Planning Area Matrix, *page 65*, Number 2, according to initial traffic analyses conducted by County staff, Harmony Grove Road does not need to have a continuous turn lane from Country Club Drive to Citracado Parkway to accommodate the expected traffic resulting from adoption of the Draft Land Use Map for the area.

In Number 3, Village Road should be changed to the approved name, Lariat Drive.

Country Club Drive north of Lariat Drive is accurately shown as a local road in the mobility element map, but its downgrading from a circulation element road to a local road is not called out in the numbered changes shown in the SDPG planning area matrix.

The Elfin Forest Harmony Grove Town Council respectfully requests that you consider the following when making your recommendations concerning the General Plan Circulation Element Update for the San Dieguito and Harmony Grove areas:

- 1) Downgrading of Elfin Forest Road from a 4-lane collector to a 2-lane collector.
- 2) Downgrading of Harmony Grove Road from a 4-lane collector to a 2-lane collector.
- 3) Removal of Country Club Drive from the county’s circulation element.

- 4) Elimination of the planned extension to Del Dios Highway of Country Club Drive, commonly known as SC1375.

Thank you for the opportunity to comment on this program.

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

Melanie Fallon, Chair, Elfin Forest Harmony Grove Town Council

cc: San Diego County Supervisors, San Diego County Planning Commissioners; San Dieguito Planning Group; Eric Lardy