



December 1, 2022

Chair Jim Desmond and LAFCO Commissioners
San Diego LAFCO
Via Email michaela.peters@sdcounty.ca.gov

RE: ITEM 6a: OPPOSE Special Study Designation ITEM 6a December 5, 2022 meeting

Dear Chair Desmond and Commissioners:

Sierra Club North County Group (NCG) is writing today to repeat our opposition to designation of a Special Study Area for Harvest Hills as part of your action on the Escondido SOI. Over 20 organizations and numerous residents have already written LAFCO in opposition to this action.

All of the many issues outlined in the September 6, 2022 letter (attached) are still valid and support opposition to this designation.

In addition, the staff report (page 3) notes that there is a 1,000 acre reduction proposed in the Escondido SOI due, in part because, ***“...lands are located beyond the current range of the City’s existing infrastructure.”*** (emphasis added). This statement is also true for the lands proposed to be annexed for Harvest Hills. The Harvest Hills lands are **far beyond** the City’s range of infrastructure. It makes no sense to expand the SOI into lands with the very same conditions for which the city is shrinking it.

Further, designation of the Special Study Areas for development that will cost the city and further deplete its budget, is of continued concern now that it appears the Escondido sales tax measure has failed.

In addition, the County’s comment letter dated October 21, 2022 outlined and requested many extant policies from its General Plan to be included in the MSR. However, these were not. The County letter states, *“The County finds that the omitted land use, conservation, and open space policies in the County’s General Plan are relevant, given the existing interface between urban and non-urban uses along the jurisdictional boundary between the County and the City. Identification and inclusion of these policies into the MSR Report is essential to render a decision on the proposed LAFCO recommendations.”* (County letter at 1) The Escondido MSR should be amended to include this request from the County and remove the Special Study Area.

In conclusion, Sierra Club NCG continues to oppose the Escondido Special Study area which would allow for early consideration, thus ‘fast-tracking’ for a specific speculative development (Harvest Hills). The record contains abundant information that this project has an unprecedented fire hazard risks and endangers on-site and surrounding communities. It threatens a globally significant endangered species facility and major economic driver for our region, the Safari Park.

We urge you to safeguard our region and remove the Special Study area for Harvest Hills.

Thank you for your consideration,
Laura Hunter, Chair
Sierra Club NCG Conservation Committee

Attch September 6, 2022 NGO comment letter opposing Special Study Area for Harvest Hills